Report run on: October 10, 2014 10:45 AM

ID / Dist Name / Location Address ... County Regulated Activity NJD096873724 FORMER THOMAS & BETTS ELIZABETH SITE CENTRAL 36 BUTLER STREET CG ----ELIZABETH NJ 07206 UNION

Current Federal Activities

Hazardous Waste Conditionally-Exempt Very Small Generator

Other State Interests

-State Not a generator, Verified

Sources Overwritten Prior to 2001 (before RCRA kept history for activity/address/contact)

01/01/07 I State/EPA 01/01/06 I State/EPA 04/02/04 R 03 Biennial 09/26/96 R 95 Biennial 02/22/94 R 93 Biennial 02/28/92 R 91 Biennial 04/12/90 R 89 Biennial 08/13/80 N Notification

Extract Flag

All data for this Handler is released to the Public (except any enforcement-sensitive CME data) Activity Location

Handler Module Data for NJ State only

Previous/Other Site Name

09/26/96	95 Biennial	THOMAS & BETTS	
02/22/94	93 Biennial	THOMAS & BETTS CORP	
02/28/92	91 Biennial	THOMAS & BETTS CO. THE	
04/12/90	89 Biennial	THOMAS & BETTS COMPANY	
08/13/80	Notification	THOMAS & BETTS CO THE	

Location Address

ET

UNION (NJ039)

ELIZABETH, NJ 07206 State District: CENTRAL Land Type: Private (P)

01/01/06 State/EPA 36 BUTLER STREET

UNION (NJ039)

ELIZABETH, NJ 07206 State District: -Land Type: Private (P)

09/26/96 95 Biennial 36 BUTLER ST

UNION (NJ039)

ELIZABETH, NJ 072070000 State District: CENTRAL

Land Type: ()

RCRARep Handler Detail Report

NJD096873724

NJD096873724			
Location Address			
02/28/92 91 Biennial	36 BUTLER ST.		
	UNION	(NJ039)	
	ELIZABETH, NJ 072060000		
	State District: CENTRAL		
	Land Type: ()		
04/12/90 89 Biennial	36 BUTLER STREET		
	UNION	(NJ039)	
	ELIZABETH, NJ 07207		
	State District: CENTRAL		
	Land Type: ()		
08/13/80 Notification	36 BUTLER ST		
	UNION	(NJ039)	
	ELIZABETH, NJ 07207		
	State District: CENTRAL		
	Land Type: ()		
North American Industri	ial Classification (NAICS)		
01/01/07 State/EPA	32311 33231 332813 335932	514199 54138 56172 562	211
01/01/06 State/EPA			
04/02/04 03 Biennial			
09/26/96 95 Biennial			
02/22/94 93 Biennial	3323 562 32311 3323 332813 335932		
02/28/92 91 Biennial	32311 3323 332813 335932	514199 54138 56172 562	2
04/12/90 89 Biennial	335932		
32311 PRINTING			
332212 HAND AND EDGE	TOOL MANUFACTURING		
	AND STRUCTURAL METALS MANUFACT	URING	
	D FABRICATED STRUCTURAL PRODUCT		
332813 ELECTROPLATIN	G, PLATING, POLISHING, ANODIZING	G, AND COLORING	
	ING WIRING DEVICE MANUFACTURING		
335932 NONCURRENT-CA	RRYING WIRING DEVICE MANUFACTUR	ING	
514199 ALL OTHER INF	ORMATION SERVICES		
54138 TESTING LABOR	ATORIES		
56172 JANITORIAL SE	RVICES		
562 WASTE MANAGEM	ENT AND REMEDIATION SERVICES		
56211 WASTE COLLECT	ION		
Mailing Address			
01/01/07 State/EPA	8155 T&B BLVD.		

01/01/07	State/EPA	8155 TAB BLVD.
		MEMPHIS, TN 38125
09/26/96	95 Biennial	5601 EAST HIGHLAND DR
		JONESBORO, AR 724010000
02/22/94	93 Biennial	36 BUTLER ST
		ELIZABETH, NJ 072070000
02/28/92	91 Biennial	36 BUTLER STREET
		ELIZABETH, NJ 072060000

RCRARep Handler Detail Report

Report run on: October 10, 2014 10:45 AM

NJD096873724

Mailing Address

04/12/90 89 Biennial 36 BUTLER STREET

ELIZABETH, NJ 07207

08/13/80 Notification 36 BUTLER ST

ELIZABETH, NJ 07207

Contact

01/01/07 State/EPA OM P CHOPRA

8155 T&B BLVD. MEMPHIS, TN 38125

Phone: (901)252-5937

eMail: OM_CHOPRA@TNB.COM

09/26/96 95 Biennial

ARTHUR E MALANGA

04/12/90 89 Biennial JOHN FUSCO

Phone: (201)351-8800 200

Phone: (501)935-2559 236

08/13/80 Notification

ALFRED ROTTMANN

36 BUTLER ST ELIZABETH, NJ 07207

Phone: (908)351-8800

Legal Owner/Operator of Site

01/01/07 State/EPA Current Owner from -

THE THOMAS & BETTS CORP (Private)

NOT REQUIRED

NOT REQUIRED, WY 99999 Phone: (212)555-1212

Notes: This record created to coincide with EPA Mass Update for 01/

01/2007 on Rundate: 06/11/2008

01/01/07 State/EPA Current Operator from 12/20/1999 -

NO NAME FOUND (Private)

Notes: This record created to coincide with EPA Mass Update for 01/

(Private)

01/2007 on Rundate: 06/11/2008

04/02/04 03 Biennial Current Operator from 12/20/1999 -

ELIZABETH INDUSTRIAL CENTER, L.L.C. (Private)

08/13/80 Notification

Current Owner from -

THE THOMAS & BETTS CORP

NOT REQUIRED

NOT REQUIRED, WY 99999 Phone: (212)555-1212

Regulated Hazardous Waste Activities

01/01/07 State/EPA

Federal Conditionally Exempt SQG State Not a generator, Verified

Page 3

Report run on: October 10, 2014 10:45 AM

RCRARep Handler Detail Report

NJD096873724

Regulated Hazardous Waste Activities

01/01/06 State/EPA

Federal Small Quantity Generator State Not a generator, Verified

04/02/04 03 Biennial

Federal Not a Generator

09/26/96 95 Biennial

Federal Large Quantity Generator

02/22/94 93 Biennial

Federal Large Quantity Generator

02/28/92 91 Biennial

Federal Large Quantity Generator

04/12/90 89 Biennial

Federal Large Quantity Generator

08/13/80 Notification

Federal Large Quantity Generator

Waste Codes

04/02/04 03 Biennial D040

08/13/80 Notification F001 F002 F006 F007 F008 F009 P030 P106

P121 U154 U228

D040 TRICHLORETHYLENE

THE FOLLOWING SPENT HALOGENATED SOLVENTS USED IN DEGREASING: TETRACHLOROETH YLENE, TRICHLORETHYLENE, METHYLENE CHLORIDE, 1,1,1-TRICHLOROETHANE, CARBON TETRACHLORIDE AND CHLORINATED FLUOROCARBONS; ALL SPENT SOLVENT MIXTURES/BLE NDS USED IN DEGREASING CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MO RE (BY VOLUME) OF ONE OR MORE OF THE ABOVE HALOGENATED SOLVENTS OR THOSE SO LVENTS LISTED IN F002, F004, AND F005; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

THE FOLLOWING SPENT HALOGENATED SOLVENTS: TETRACHLOROETHYLENE, METHYLENE CH LORIDE, TRICHLOROETHYLENE, 1,1,1-TRICHLOROETHANE, CHLOROBENZENE, 1,1,2-TRIC HLORO-1,2,2-TRIFLUOROETHANE, ORTHO-DICHLOROBENZENE, TRICHLOROFLUOROMETHANE, AND 1,1,2, TRICHLOROETHANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF TH E ABOVE HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F004, AND F0 05; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT S OLVENT MIXTURES.

WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS, EXCEPT FROM THE FOLLOWING PROCESSES: (1) SULFURIC ACID ANODIZING OF ALUMINUM; (2) TIN PLATING ON CARBON STEEL; (3) ZINC PLATING (SEGREGATED BASIS) ON CARBON STEEL; (4) ALUMINUM OR ZINC-ALUMINUM PLATING ON CARBON STEEL; (5) CLEANING/STRIPPI NG ASSOCIATED WITH TIN, ZINC, AND ALUMINUM PLATING ON CARBON STEEL; AND (6) CHEMICAL ETCHING AND MILLING OF ALUMINUM.

F007 SPENT CYANIDE PLATING BATH SOLUTIONS FROM ELECTROPLATING OPERATIONS.

F008 PLATING BATH RESIDUES FROM THE BOTTOM OF PLATING BATHS FROM ELECTROPLATING OPERATIONS IN WHICH CYANIDES ARE USED IN THE PROCESS.

RCRARep Handler Detail Report

NJD096873724

Waste Codes

SPENT STRIPPING AND CLEANING BATH SOLUTIONS FROM ELECTROPLATING OPERATIONS
IN WHICH CYANIDES ARE USED IN THE PROCESS.
CYANIDES (SOLUBLE CYANIDE SALTS), NOT OTHERWISE SPECIFIED
SODIUM CYANIDE (OR) SODIUM CYANIDE NA(CN)
ZINC CYANIDE (OR) ZINC CYANIDE ZN(CN)2
METHANOL (I) (OR) METHYL ALCOHOL (I)
ETHENE, TRICHLORO- (OR) TRICHLOROETHYLENE

Report run on: October 10, 2014 10:45 AM

Certification

Certification	
01/01/07 State/EPA	BRS-MANIFEST MASS UPDATE
	Signed: 01/01/07
01/01/06 State/EPA	BRS CYCLES 2001 2003 2005 BRS 2001 2003 2005
	Signed: 01/01/06
04/02/04 03 Biennial	DIR, ENV. AFFAI OM P CHOPRA
	Signed: 04/02/04
09/26/96 95 Biennial	ENVIR ENGINEER ARTHUR E MALANGA
	Signed: 09/26/96
02/22/94 93 Biennial	ENV ENG'R ARTHUR E MALANGA
	Signed: 02/22/94
02/28/92 91 Biennial	PLANT MANAGER JOHN F FUSCO
	Signed: 02/28/92

Signed: 04/12/90

Biennial Reports Included/Excluded in Reports

04/12/90 89 Biennial PLANT MANAGER JOHN FUSCO

04/02/04 03 Biennial	Site's Biennial Report	data included in 200	3 BR National report.
09/26/96 95 Biennial	Site probably included	in 1995 BR National	report.
02/22/94 93 Biennial	Site probably included	in 1993 BR National	report.
02/28/92 91 Biennial	Site probably included	in 1991 BR National	report.
04/12/90 89 Biennial	Site probably included	in 1989 BR National	report.



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER	THE THOMAS & BETTS COMPANY	
	36 BUTLER STREET ELIZABETH WJ	07207
INSTALLATION ADDRESS	> 36 BUTLER STREET ELIZABETH NJ	67207

EPA Form 8700-12B (4-80)

10/09/80

SEPA	NOTIFICATION OF HAZARDOUS WASTE ACTIVITY	INSTRUCTIONS: If you received a preprinted lebel, affix it in the space at left. If any of the
INSTALLA- TION'S EPA I.D. NO.		information on the label is incorrect, draw a line through it and supply the correct information
NAME OF IN-	NJD096873724	in the appropriate section below. If the label is complete and correct, leave Items 1, 11, and 111 below blank. If you did not receive a preprinted
INSTALLA- TION II. MAILING ADDRESS	THOMAS & BETTS CORPORATION 36 BUTLER ST> ELIZABETH, NJ 07207	label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFI-
LOCATION III OF INSTAL- LATION	-36 BUTLER SF E <u>LIZABETH: HJ -0720</u> 7	CATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).
FOR OFFICIAL		
installati	ON'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr., mo., & day)	55
I. NAME OF INS	TALLATION	
30	OMAS & BETTS COMPAMY	57
II. INSTALLATI	ON MAILING ADDRESS STREET OR P.O. BOX	
33680	TLER STREET	45
5116	CITY OR TOWN ST. ZIP	CODE
4 ELIZA	3 E T H	207
	OF INSTALLATION	
536 BU	7 L E L STREET OR ROUTE NUMBER	
18 16	CITY OR TOWN ST. ZIP	CODE
6ELIZA		207
IV. INSTALLAT	ION CONTACT	31
	NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 4 L 1 RE	D ROTTMANM MAINT MGR	45 46 - 48 49 - 51 52 - 55
V. OWNERSHIP	A. NAME OF INSTALLATION'S LEGAL OWNER	
8 THE T	HOMAS & BETTS CORPORATIO	A 55
B. TYPE OF (enter the appropria		nter "X" in the appropriate box(es))
F = FEDERAL M = NON-FE	DERAL C. TREAT/STORE/DISPOSE D. I.	TRANSPORTATION (complete item VII)
VII. MODE OF T	RANSPORTATION (transporters only – enter "X" in the appropriate b	pox(es))
☐ A. AIR	B. RAIL C. HIGHWAY D. WATER SE. OTHER	(specify):
	SUBSEQUENT NOTIFICATION propriate box to indicate whether this is your installation's first notification of haza	grique wasta antivity or a subsequent natification
If this is not your fir	st notification, enter your Installation's EPA I.D. Number in the space provided be	elow.
		C. INSTALLATION'S EPA I.D. NO.
	NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item	(C)
	N OF HAZARDOUS WASTES res of this form and provide the requested information.	
EPA Form 8700-12		CONTINUE ON REVERSE

ſ			1.0). —	FO	R	3FF	ICI	AL	US	K C	NL	Υ.		
F	w	N	7	D	٥	9	6	8	7	3	7	2	Ÿ	5	1
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			s (continueu from fr			
	ARDOUS WASTES FRO from non—specific sout				0 CFR Part 261.31 for	each listed hazardous
j	T 0 0 /	F 0 0 Z	3 F 0 0 6	4 F 0 0 7	5 F 0 0 8	F 0 0 9
	23 - 30	22 - 26	23 - 26	23 . 24	23 - 26	23 - 26
	ARDOUS WASTES FRO				Part 261.32 for each li	sted hazardous waste from
	13	14	15	16	17	18
1	23 - 26	23 - 26	37 - 26	23 - 26	23 - 26	23 - 26
	19	20		22	23	24
	25 26	23 - 26	25 - 26 27	23 - 26 28	23 - 26	23 - 26 30
	23 - 26	23 - 26	23 : 24	23 - 25.	23 - 26	23 - 26
	MERCIAL CHEMICAL I your installation handle					for each chemical sub-
	31	32	33	34	35	36
. •	P030	7106	7/2/	U 1 5 4	U Z Z 8	23 - 26
	37	38	39	40	41	42
•						
<u></u>	43	23 - 25	23 · 26 45	23 - 26 A6	23 - 26 47	23 - 26 48
•						
D. LISTE	D INFECTIOUS WAST als, medical and research	ES. Enter the four—dingle haboratories your inst	git number from 40 CF allation handles. Use a	R Part 261.34 for each	isted hazardous waste	from hospitals, veterinary
	49	50	51	52	53	54
	2.3 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 26
E. CHAR hazard	ACTERISTICS OF NOI ous wastes your installa	N-LISTED HAZARDO	OUS WASTES. Mark "2 CFR Parts 261.21 — 26	K" in the boxes corresponded.	onding to the character	stics of non-listed
	1. IGNITABLE	□2. (D002	CORROSIVE	☐3. REACTI (D003)		□4. TOXIC 2000)
X. CER1	TIFICATION				·	
I believ	a aocuments, and th	nat based on my inc i information is true	uiry of those indivi	duals immediately re	enoneible for obtain	nitted in this and all sing the information, ant penalties for sub-
SINATU	RE //	1	NAME & OFFICE	AL TITLE (type or prin	it)	DATE SIGNED
\mathcal{M}	The	Ruser	John Fusc	o - Plant Mana	ger	8/4/80
EPA/For	8700-12 (6(80) REV	ERSE				

ap

TEB/Thomas & Betts

August 8, 1980

E. P. A. Region II Information Service Center 26 Federal Plaza New York, New York 10278

Reference No.: NJD096873724

Dear Mr. Baker:

Please accept my apologies for this oversight on my part.

Part VI of the enclosed form is corrected and should meet all the requirements.

Sincerely yours,

A. E. Rottmann

Maintenance Mgr.

AER/oa
Enc.



T&B/Thomas & Betts, Division of Thomas & Betts Corporation 36 Butler Street, Elizabeth, New Jersey 07207 201-351-8800 TELEX 83-3190 TEB/Thomas & Betts

E.P.A. Region II
Information Service Center
26 Federal Plaza
New York, New York 10278

Att: Manager

Dear Sir:

On October 30, 1980 I inquired about our Plant I.D. number,

Ms. Garcia informed me that we should receive the above by November 6, 1980, to date we are still without an I.D.

I would appreciate if you could expedite this matter at your earliest convenience.

Respectfully

A. E. Rottmann

Maintenance Manager

Allen Ce

AER/oa

TEB

T&B/Thomas & Betts, Division of Thomas & Betts Corporation
36 Butler Street, Elizabeth, New Jersey 07207 201-351-8800 TELEX 83-3190

ENVIROMENT PROTECTION AGENCY REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

Page#1 of 1

fl

L.GEHERATOR'S NAME	Thomas & Betts Company		2.EPA 1D N	o. NJD	096873724	
LADDRESS 36 But	ler Street - Elizabeth, NJ	07207	prophenology lank Al-S Sh. "I Principle & d. s. of C 1800 at 1			
	NE Inland Pollution Servi		5.EPA ID N	oNJDO	00692160	
7. FACILITY'S NAME	G. R. O. W. S., INC.		B.EPA ID N	O. PAD	800424589	
10.MANIFEST NO.	d Mill Road - Morrisville, DESCRIPTION OF WASTE	DOT HAZ.CLASS				TYPE REJECTED
0069519	Oil Contaminated/Soil & De	bris <u>N.A.</u>	15	2	X-725	
			erindesitisadilmilgis — ili ili ye isi ili gazirindanid wakifara mpi maga		n ngang pagan ngih titig gallakinin bermilan (p. 4-4) - aram, 160 Ber	
5. E			and the second s			ing a garage and a second
			a describidados paleiras e en composições composições de composiçõ			
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			andright day almost de to an anadada and first a			
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^{* -} PLACE AN "*" UNDER THE REJECTED COLUMN FOR THOSE MANIFESTS REJECTED BY FACILITY.

Ple

ENVIROMENT PROTECTION AGENCY REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

Page 1 1 of 1

L.GEHERATOR'S NA	ME The Thomas & Betts Co.		2.EPA ID N	o. NJD	096873724	
1. ADDRESS 36	6 Butler Street Elizabeth, N	lew Jersey 07207				
4.TRANSPORTER'S	NAME Jocar Trucking		5.EPA ID N	o. NJT	<u> 350012183</u>	
S.ADDRESS P.	.O. Box 1430 Toms River, New	Jersey 08753				
7,85011J1TY'S NAM	E Chemical Waste Managem	ent Inc.	8.EPA ID N	o. ALT	000622464	designation in state of the department of the second secon
D. ADDRESS	P.O. Box 55 Emelle, Alabama	35459				
	DESCRIPTION OF WASTE	DOT HAZ.CLASS	<u>Ο</u> υλητίτη	UNITS	EPA WASTE	TYPE REJECTO
	Cyanide Solution	Poison B	9954	1	F007	
85 6-10 N						

HAZARDOUS WASTE REFERRAL CHECKLIST

Nam	e of Violator: The Thomas & BETTS CORP.			
Dat	e of Violation: $1/27/89$			
Sit	e Specific Code: 32 / (major facility)	YES	NO	NA
λ.	Referral Form:			
	1. Accurate full name and address of violator	<u>~</u>		
	2. Identification number (EPA or Incident #)			
	3. Location of violation (Incl. TWP.& CO.)	<u>~</u>		
	4. Block and Lot #'s			
	5. Accurate Date of Discovery	<u>``</u>		<u> </u>
	6. Accurate mailing address (Resp. Party)	<u></u>		
	7. Accurate list of all citations	<u> </u>		
	8. List of classes for all citations	<u></u>		
	9. Past History past two years	<u>/</u>		
	10. Signature of Section Chief & Bur. Chief	\underline{V}		
В.	Copy of Investigation Report	<u> </u>		
С.	Copy of Re-eval. Investigation Report	<u> </u>		
D.	Copies of Field NOV's & Supporting Data	~		
Ē.	Copy of Sampling Reports (If applicable)			
F.	Duplicate copy of Photo's			
G.	Copies of Corres. between DEP & Violator			
Н.	Timeliness HPV 45 days form Date of Discovery			
I.	Timeliness MPV/LPV 60 days from DOD	<u></u>	_	
INVI	estigators initials: Be			
SUPI	ervisors initials: 163 / A			

Form HWM-001 8/86

NEW JERSEY DÉPARTMENT OF ENVIRONMENTAL PROTEC...JN DIVISION OF HAZARDOUS WASTE MANAGEMENT ENFORCEMENT ELEMENT

21-04-132

ENFORCEMENT REFERRAL

TO: Y.E. YACOUR THRU]. STERLING	DATE: Fel	2.06.89	
FROM: BOLESLAN CZ	Actor	REGION:	M	
RE: The Thomas; Name of Facility Lt. 02,82, BL. Lot and Block 36 BUTLER STR, EL Malling A	2 ELIZABE	71+,	BUTLER STR, E Location Address UNION County 17 MANGA - EN.	
The attached inspection/investig it is recommended a 1.0.	. 1	100	is being referred and	
NJAC 7:26- 9. 3 (b) -	no engineering of	provil f	on the Deports	nert-
9.4018; — 9.4838;; —	no petition file	ed with	the Deporting	ent vides
NJSA 58:10-			-	
	Suggested penalty:	-		
ADDITIONAL COMMENTS:				
tory dy with 140.4				
	.,)			

White - Enforcement and Compliance Copy Yellow - Region Copy Form HWM-004 3/87

NEWSERSEY DEPARTMENT OF ENVIRONMENTAL PROFECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT

2 BABCOCKPL. W. URANGE, N.) 07052 NOTICE OF VIOLATION

	TE Jon. 27, 89
NAME OF FACILITY The Thomas & T	BETTS CRP
LOCATION OF FACILITY 36 BUTLER ST	IR, ELIZABETH, N. 07207
NAME OF OPERATOR ARTHUR MALANO	SA - ENVIR ENG.V

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION N. A.C. 7:26-9.44318 - no se	mi -
onnual drills conducted.	
NJ.A.C. 7:26-9.46(2)81- hiling to petition	the
Department for exemption,	
M.A.C.7:26-9.46)811 - Inling to petition	on the
Deportment for exemption excluding	local
efficials	

Remedial action to correct these violations must be initiated immediately and be completed by

shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$25,000 per violation.

Investigator, Division of Waste Management
Department of Environmental Protection

Form HWM-004 3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION **DIVISION OF HAZARDOUS WASTE MANAGEMENT**

2 BABCOCK PL. W. ORANGE, N. 07052.
NOTICE OF VIOLATION

NAME OF FACILITY The Thomas BETTS CORP
LOCATION OF FACILITY 36 BUTTLER STR, ELIZABETH, M. 07207
NAME OF OPERATOR ARTHUR MALANGA - EN VIRON. FAIG.
TABLE OF GLERATON INTO THE PROPERTY OF THE PRO
You are hereby NOTIFIED that during my inspection of your facility on the above date, the following
violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C.
7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed.
These violation(s) have been recorded as part of the permanent enforcement history of your facility.
DESCRIPTION OF VIOLATION NJ. A.C. 7:26-9.3(b) - friling to obtain a written approval for above- ground brile from the Department.
Remedial action to correct these violations must be initiated immediately and be completed by Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a
violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initi- ating further administrative or legal action, or from assessing penalties, with respect to this or other
violations. Violations of these regulations are purishable by your lation of \$25,000 many inlations

Investigator, Division of Waste Management Department of Environmental Protection

NEW JERSEY F PARTMENT OF ENVIRONMENTAL TOTECTION DIVISION OF HAZARDOUS WASTE MANAGENLAT HAZARDOUS WASTE INSPECTION REPORT

DWM-029

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: THE THOMAS & BETTS CO
FILE NUMBER:
VHT FACILITY FILE NUMBER:
PERMIT #:
REGION: M
INSPECTION DATE: Jan. 27. 89
INCIDENT/CASE NUMBER:
INSPECTION TYPE: GEN/LB
RESPONSIBLE AGENCY CODE: 5
INSPECTOR'S NAME: B. EZACHOR D. BURGOYNE
INSPECTOR'S AGENCY: DHWM
INSPECTOR'S BUREAU: BFO- M
EPA ID NUMBER: P) 296873724
ADDRESS: 36 BUTLER STR
ELIZABETH N.7.07206
LOT: 02,82, BLOCK: 2
COUNTY: UNION
FACILITY PERSONNEL: ARTHUR MALANGA - ENVIRIN. ENG.
TELEPHONE #: LOI-351-8800
OTHER STATE/EPA PERSONNEL: BURGOYNE DANIEL-NJ.DE
REPORT PREPARED BY: BOLESLAW CZACHOR
$\supset O \cap O$:
REVIEWED BY: JHSleeting
DATE OF REVIEW: $\frac{2/15/89}{}$

REVISION: 3

c k				
	TIME IN: 1120			
•	TIME OUT:			
•	PHOTOS TAKEN () YES	. ✓ NO	if yes, how many? N/A	-
	SAMPLE TAKEN () YES	(<u>U</u> NO	NO. OF SAMPLES \mathcal{N}/\mathcal{A}	
			NJDEP SAMPLE ID#: NJA	—
	MANIFESTS REVIEWED (V)	YES () NO	
	Number of manifests	in compliance	106	
	Number of manifests	not in compli	lence	
	List manifest compliance.	document n	numbers of those manifests not	in
	· ·	•	•	
				•

·
·

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:
The Thomas: BETTS GRP., located in
ELIZABEIH, N.J. with the EPA assigned ID
number NJD096873724 is a mounfacturer
I metal components for electronic instrustry.
The manufactioning process involves an operation,
as Morring: metall stamping, electroplating,
med history umodring metal messing,
entting monetal tooling. Bosic metals
used in puduction are steel, maleable
ivon and aluminum and electropheting
operations are done mostly with zine out
chronium.
The how work one generated primerly
in metal parts degreesing operations,
in metal parts degreesing operations,
in metal parts degreesing operations. I where northe is used and the write type
in metal parts degreesing operations. I where northe is used another write type Dool is generated. The company a ceased
in metal parts degreesing operations. I where napha is used another work type Dool is generated. The company a ceased usage of any solvents since those substantance cees are begin highly regulated. The manage- wents of weephta should and Dool works
in metal parts degreesing operations, I where northe is used another work type Dool is genevated. The company a ceased usage of any solvents since those substance cees are begin highly regulated. The manage-
in metal parts degreesing operations. I where napha is used another work type Dool is generated. The company a ceased usage of any solvents since those substance cees are typically regulated. The manage-inents of Maphila should and Dool works
in metal parts degreesing operations. I where northe is used and the worke type Dool is genevated. The company & ceased usage of any solvents sinte those substance cees are beging highly regulated. The manage-inento of whether should by Safety-Kleen Corp. The second source of we worke generated on site is the w/w treatment plant for
in metal parts degreesing operations, I where northe is used and the worke type Dool is genevated. The company a ceased usage of any solvents since those substant cees out begin highly regulated. The manage-igents of whether should and Dool worked is completly provided by Safety-Kleen Corp. The second bourse of war worke generated
in metal parts degreesing operations. I where northe is used and the worke type Dool is genevated. The company & ceased usage of any solvents sinte those substance cees are beging highly regulated. The manage-inento of whether should by Safety-Kleen Corp. The second source of we worke generated on site is the w/w treatment plant for

SUMMARY OF FINDINGS

PACIEITY DESCRIPTION AND OPERATIONS (CONTINUED):
is designed that clean water is discharged
into the public rewer Joint Meeting perhit
MO150) ond sludge is mu of though
litter press and dryier then it is drawned
up intel 55 CHL drums and disposed off site
is Fool worte. This type of worke poes to
the Michigan Disposal Co. WAYNE, MI.
Also bear some omounts of Dooz
are senevated in electroplating operations.
The med moditing spendions results in
generation - wister enting oils and
Coste libricating oils, X728, this type
of worke is disposed of site with the
of worke is disposed of site with the
company spende two obsequent works
pil storiet toute, one of 2500 Goth
copacity is used for waste lubricating oil
which to of higher andity, the second
Lond of two offw copacity is used
To extreme of oil and water (on thing oil).
Both touler lappeared to be in polis
condition, diken and property operated,
however I worked that bourgony.
had no written approval to opente

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):
hose lonks how the BHWE, as per
Mitte 7:26-9.3(b);
The physical inspection of the facility
reveoled that it has in good housekdeping
and good insurgement of hor worke
containers which were in storage. Also
the inspection of the obscurrentation of required
under the RERA reverled that it was
in substantial compliance with the N.7- Hor.
Worte Regulations, exept that there was
no obsumeration Hot emergency response
drills were conducted on per NATE 7:26 -
7-4618:
Also it should be noticed that company
is a subject to LBR regulations becouse
the listed Fook work is generated on
site.
The company ites not have a post
history records I'm this office.

Describe the activities that result in the generation of hazardous waste	•
- electroploting ferotions	
- metal parts begreesing operation.	
- metal modining spections	
- maintenance operation,	
Identify the hazardous waste located on site, and estimate the approxi	mat
quantities of each. (Identify Waste Codes)	
DOOZ-11 DRIMS	
FOOG-18 DAVMS	
X726-N1000GAL.	
•	
	_

GENERAL	GENERAL CHECKLIST	YES	NO N/A	<u>.</u>
7:26-7.4(a)1	Does the Generator have an EPA ID number?	X	_	
HAZARDOUS WASTE DET	ERMINATION			
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	×		_
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	¥		
	Is the waste hazardous?	X		
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	×		-
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing end obtain a copy of the incomplete manifests. (List those manifests that are deficient on			
	G-1).	\neq		
7:26-7.4(æ)41	The generator's name, address and phone number.	×		
7:26-7.4(a)411	The generator's EPA ID number.	¥	_	
7:26-7.4(a)4111	The hauler(s) name, address phone number and NJ registration.	×		
7:26-7.4(a)41v	The hauler(s) EPA ID number.	×		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	×		_
7:26-7.4(a)4vi	The TSF's EPA ID number.	X		_
7:26-7.4(a)4v	The name, address and phone number of the designated TSD fecility.	<u>X</u>		
7:26-7.4(a)4v11	The name, type and quantity of hazardous waste being shipped, including such particulare as may be required regarding same?	X		
7:26-7.4(a)4v111	Special handling instructions and any other information required on the form to be shipped by generator?			

	•	YES	<u>NO</u>	N/A	
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	×	<u>,</u>		
7:26-7.4(a)1x	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	×	, -		_
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	¥	<u>,</u>	_	_
7:26-7.4(a)51	Sign the manifest certification by hand?	X	_		
7:26-7.4(a)511	Obtain the handwritten signature of the initial transporter and data of acceptance on the manifest?	¥	_		
7:26-7.4(a)5111	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	K	<u>.</u>		
7:26-7.4(a)51v	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	$\underline{\times}$	_		
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	¥	_		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	×	<u> </u>		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	, <u>×</u>	<u>/</u>		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	, 	_		*
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45	ł			√

days ago?

7:26-9.3	Accumulation Time
	How is waste accumulated on site? (Containers Tanks (greater than 90 days) (complete HWMF (TSD) Facility Checklist) Tanks (less than 90 days) Above ground Surface impoundments (complete HWMF (TSD) Facility Checklist) Piles (complete HWMF checklist)
7:26-9.3(a)1	Is waste accumulated for more than 90 days?

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

G-9

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

YES NO N/A

Containers		YES	NO	N/A
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). - D - D 0 2 1 - D 1 - D 6			
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	×		
	If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)41	Ara all containers securely closed except those in use?	\times		
7:26-9.4(d)4111	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?	\preceq		
7:26-9.4(d)41v	Are containerized hazardous wastes segregated in storage by waste type?	× ×		
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	· ×		_
7:26-9.4(d)5	Is the container storage area inspected at least daily?	$\stackrel{\checkmark}{\succ}$		
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?		_	
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number or all hazardous waste containers that are intended for shipment?			
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?			

		YES	<u>NO</u>	N/A	
7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)	×			
Tanks (Less than 90	day storage)				
7:26-9.3(b)	Does the generator accumulate hazardous waste on-site in an above ground tank?	,×	′ • •		
	If yes, describe the tank(s): 1) Capacity 5000 CAL 2) Shell thickness 3) Material Construction 5 ce 4) Age of tank	lin	500	lofe	الم
7:26-9.3(b)	Does the generator have written approvel from the Department to store hazardous waste(s) in this tenk(s) for ninety days or less?		- ,	×	
7:26-9.3(b)1	Does each tank(s) have sufficient shell thickness to ensure the tank will not collepse or rupture as specified by the Department?	کر	<u>′</u> .		
7:26-9.3(b)4	Is the tenk(e) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?	<u>></u>	<u> </u>		
7:26-9.3(b)5	Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?	¥		_	
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized fecility?	, ,	<u>(</u> .		
7:26-9.3(b)8	If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is secondary containment provided for the below grade part?		· .		×
7:26-10.5(c)1	Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?		.	¥	
7:26-10.5(c)2	Does the generator use appropriate controls and practices to prevent overfilling? To protoum and red	<u>X</u> Li	<u>S</u>	-	_

		YES 1	NO N/A	<u> </u>
7:26-10.5(c)211	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?		_	_×
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	X		
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	×		
7:26-10.5(d)11	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	ı ∡	_	
7.26-10.5(d)11	Does the containment system consist of material compatible with the wastes being stored?	×		
7:26010.5(d)111	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation	1 <u>X</u>	_	
7:26-10.5(d)111	Is the tank protected from contact with accumulated liquids?	×		
7:26-10.5(d)1v	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	×		
7:26-10.5(d)2	Is run-on into the containment area prevented?	×		
	If not, explain.			
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?	×		
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	×		

		YES NO	N/A	
7:26-10.5(d)41	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?	×		
7:26-9.4(g)4	Personnel Training			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a naw position at the facility?	*	—	_
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	$\not\succeq$	_	
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	×		
	Is there written documentation of the following:			
7:26-9.4(g)61	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	×		_
7:26-9.4(g)611	A written job description for each position related to hazardous waste management?	×		
7:26-9.4(g)6111	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management			
7:26-9.4(g)61v	Documentation of actual training or experience received by personnel?	×		_
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	· -×		

YES NO N/A

7:26-9.6	Preparedness and prevention			
	Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-96(b)1	An internal communications or alarm system?	X	_	
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	\times		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	×		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic aprinklers, or water spray system?	×		
7:26-9.6(c)	Is equipment tested and maintained?	_	_	_
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?	$\not\succeq$		
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	,×.		
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	×		
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type waste handled on site:	\Rightarrow	_	
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled — associated hazardous places where facility personnel would normally be working, entrances and			
	roads inside facility and possible evacuation routes.	\times		· <u> </u>

;

YES	NO	N/A
-----	----	-----

7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	_		\preceq
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplies?	X		_
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	, ×	· .	
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	×		_
7:26-9.6(f)6	If authorities identified in (f)l through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.			$\not\succeq$
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?	-	×	_
7:26-9.4(g)81	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?		`	
7:26-9.4(g)811	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?		$\overline{\times}$	·
	If yes, did the owner operator pro- vide those specific local officials with written approval of the exemption?		_	$\not\succeq$

7:26-9.7	Contingency Plan and Emergency Procedures	
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any umplanned sudden or non-suddan release of hazardous waste or hazardous waste constituents into air, soil or surface water?	×
7:26 ~9. 7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	×
7:26-9.7(c)	Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned eudden or non-sudden ralesse of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	×
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et saq.	×
	If yes, did the owner or operator amend that plan to incorporate hazerdous waste management provisions that are sufficient to comply with the requirements of this section?	×
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police depertments, fire departments, hospitels, contractors, and State and local emergency response teams to coordinate emergency services?	×

7:26-9.7(f)

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?

×--

7:26-9.7(g)

Does the plan include a list of all emergency equipment at the facility (such as fire axtinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?

X___

7:26-9.7(h)

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)?

X___

7:26-9.7(1)

Is a copy of the contingency plan and all revisions to the plan:

Maintained at the facility;

X___

2. Has the contingency plen been submitted to local authorities (police fire departments, emergency response teams)?

*X*___

7:26-9.7(k)

Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures?

X___

Inspector: B. CZACHUL
Address: BABERER PL.

ORANGE
Telephone No: 261-661-3960

RCRA LAND DISPOSAL RESTRICTION GENERATOR CHECKLIST

I.	HANDLER IDENTIFICATION	·	
-	The Thomas: BETTS CORP.	36 BUT	LER STR
	nangler name	B. Street (d	or other identifier
ī	ELIZABETH, N) City D. State	07207	UNION
C.	City D. State	E. Zip Code	F. County Name
(monufacturer of metal norts or ele Natural of Business; Identification of Operation	etronie industry	
G.	1	ons: SIC Code(s)	
	ND096873724		
H.	EPA ID		
	ARTHUR MALANGA - ENVIR. EN	1C-,	
I.	Handler Contact (Name and Phone Number)		
	CTIMP TOUR COURT TANGE		Comments
II.	GENERATOL COMPLIANCE		Comments
A.	Vaste Identification		
	1. F-Solvents N/A		
	a. Does the handler generate the follow	ing vastes?	
	(1) - P001, P002, P004, or F005	TesNo	
	(ii) F003	Yes No	
	If an F003 wastestream (listed solely for ignitability) has been mixed with a non-solid or hazardous waste, does the resulmixture exhibit the ignitability charact	restricted Ltant	
-	b. Source of the above: Form 8700-12 ; Part B other (specify)		

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

orrespo	sific ondir	d F-solvents, Appendix A-2 presents a list of g P and W wastes. Note concerns below:	_ _ _		
2.	Dioxin wastes N/A				
	8.	Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)			
F-solve	ent B	(i) F020 - F023, F026 - F027 Yes (ii) F028 Yes U	10 10		
3.	Cal	ifornia Waste Identification P/A			
	a.	Does the facility handle any of the following wastes?	E		
		(i) D002 (ii) D004 - D011 Yes	No No		
Califor	b.	characterized by high concentrations of halo genated organic constituents (HOCs), metals,	- No		
0221101	с.				
		or U vastes subject to the "soft hammer" that may qualify as California vastes due to H9C, metals, or cyanide content? See Appendix D a listing of California constituents likely be found by vaste code. Yes	t for to		
	d.	Has the generator conducted the paint filter test (Method 9095) [\$268.32(i)]? Yes			
	e.	Has the generator conducted any testing of these hazardous wastes to determine whether concentrations qualify the hazardous wastes California wastes?	as,		
		If no, has the generator retained records do menting his "applied knowledge" that the hazardous waste is not a California waste? Yes	No		

Hand : Name:
ID Number:
Inspector:
Date:

Comments

			Handler Name: ID Number: Inspector: Date:
		; 3.7(a)]	
		Describe the nature of the records: $\sim/6$	7
	f.	Source of the above: Form 8700-12; Part B; Biennial/Annual Report other (specify)	Part A NA
	4. Fir	rst Third Waste Identification	
⊗ −	a .	Does the generator handle any of the vast listed as First Third Vastes in \$268.10? Appendix E for listing. List First Third Vastes handled by the generator here:	See
	ь.	Does the generator handle any soft-hammer vestes (Appendices D-1, D-2, and F)? If list those wastes:	
	c.	Are any of the soft-hammered wastes Calibrates (see Appendix G)?	fornia No
		If yes, the wastes must meet BDAT standar prior to disposal. prior	rds
	d.	<u> </u>	
	e.	Source of the above: Form 8700-12; Part B; Biennial/Annual Reporting other (specify).	Part A
В.		reatability Group - Treatment Standards Fication	
	dif	es the generator mix restricted vastes vit ferent treatment standards for constituen ncern? Yes	
	tre	yes, did the generator select the most st eatment standard for the constituent of co 268.41(b)]?	ncern

Comments

*/ A potential violation is indicated

GEN-3

		Handler Name: ID Number: Inspector: Date:
3.	P Solvents N/A	
	a. Did the generator correctly determing appropriate treatability group [\$26 waste (e.g., wastewaters containing nonvastewater (i.e., < 1% TOC), phe wastewaters containing spent methyl chloride, all other spent solvent wastewaters.	8.41] of the good solvents, armaceutical ene
4.	California Wastes P/A-	
	a. Did the generator correctly determined distinction between liquid hazardou non-liquid hazardous wastes that coin concentrations greater than 1,00 [§268.32(h)]?	us vastes and ontain HOCs OO mg/kg
	_	_YesNo*
5.	First Third Vastes	
	a. Did the generator ascertain whether wastes were appropriately assigned or nonvestewater designations (nonvare > 1% TOC and > 1% suspended so [§268.7(a)]?	vastevater vastevaters
	b. Does the facility handle KO61 waste	es? Yes <u>V</u> No
	If yes, were nonvastevaters approper classified in either the high or 10 subcategories (≥15% Zn) [\$268.7(a) [\$268.41(a)]?	ov zinc
	c. Does the facility handle K101 or K	102 vastes? YesNo
	If yes, were nonvastevaters approper classified in either the high or l subcategories [§268.7(a)] [§268.41	ov arsenic
	d. Is there any reason to believe tha erator may have diluted the waste applicable treatment standard (bas of process operation, pipe routing sampling)?	to change the ed on review

					Handler Name: ID Number: Inspector: Date:
Vas	ite A	ralysi	<u>s</u>		
1.	Did exc	the geeds t	enerator determine reatment standards	whether the waste based on §268.7(a	: i):
	a.	Knovl	edge of vastes	Yes	No
		(i)	vac need:	hich *applied know	-
	ъ.	TCLP		Yes	No
		(i)	List wastes for w	hich "TCLP" was us	sed:
		(ii)	trations in waste wastes handled by	vastes for which e expressed as con extract. Were an the generator sulstandards not test	ncen– ny bject
			If yes, list:	7/11	
	c.	Total	veste analysis	<u>√</u> Yes	No
	d.		les were retained, of applied knowle		
•		analy	termined by TCLP of sis, provide date sting, and attach	of last test, fre	nt quency
		Da tes	/frequency:		MH
		Note	which wastes were :	subjected to whic	h <u>~</u> /A
		varia	any problems (e.g. tion of waste comp ed knowledge)	, inadequate anal position/generatio	ysis, n for

-/ A potential violation is indicated

c.

-				Handier Name: ID Number: Inspector:
	-			Date:
		е.	Were vagtes tested using TCLP or total content analysis when a process or vastest changed [\$264.13(a)(3)(i) or \$265.13(a)(3)(i) or \$265.13(a)(3)(i)	ream 3)(1)}?
	2.	abi	the restricted wastes exceed applicable lity group treatment standards upon generates.7(a)(1)]?	treat- ation
		Lis	t those that exceeded standards: +00	<u> (</u>
		Lis	t those that did not exceed standards: _A	JONE
	3.	res	the generator dilute the waste or the triidual so as to substitute for adequate tri68.3)	
D.	Han	agen	eni	
	1.	Ons	ite management	
		8.	Vere restricted vastes managed onsite?Yes	No
			If no, go to "2".	
		b.	For vastes that exceed treatment standar treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?	ds, was r No
			If yes, TSDF checklist must be completed	· 4 ×
	2.	Off	site Hanagement	
		a .	If restricted wastes exceed treatment st ards, did generator provide treatment fa notification with each shipment? [268.7(cility
			(i) EPA Hazardous Vaste Number? Yes	No*
			(ii) Corresponding treatment standard?	No*
			(iii) Manifest number?Yes	No*
			(iv) Waste analysis, if available?	No
			> % 	
			 	·
<u>*</u> /	A pot	enti	al violation is indicated GEN-6	

		Inspector:	
Ide M	ntify offsite treatment facilities CH ET SERVICE, WHYANDOTTE, I	EM-	Comments
b.	If restricted wastes do not exceed trestandards, did generator provide the difacility with a notice and certification including:	atment isposal	
	(i) EPA hazardous waste I.D. number?Ye	sNo*	
	(ii) Corresponding treatment standardYe		
	(iii) Manifest numberYe	sNo*	
	(iii) Certification regarding waste an meets treatment standards?Ye		
Ide: BDA	ntify land disposal facilities receivin	g the	
c.	If the generator's waste is subject to case by case exemption, a \$268.6 "no mexemption, or a nationwide variance (sappendix E for restricted wastes subject nationwide variances), does the general records indicate that he or she submit each waste shipment [\$268.7(a)(3)]:	digration" ee ct to tor's ////	
·	(i) EPA Hazardous Waste Number? Ye	s No*	
	(ii) Corresponding Treatment Standard		
	(iii) All applicable prohibitions?	esNo*	
	(iv) The manifest number? Ye	esNo*	
	(v) The date the vastes are subject prohibitions?		
	(vi) Does generator keep records of a notifications/certifications sen offsite facilities? Yes	nd to	

Handler Name: _______
ID Number: _____

Handler Name: ID Number:	
Inspector:	
	Connents

List all prohibited wastes for which records are not provided per above [§268.7(a)(b): Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances: If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]: The EPA Hazardous Vaste Number? Yes Applicable prohibitions? No* Yes The manifest number? Yes Waste analysis data, where available? Yes Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [\$268.33(f)]? ___Yes If yes, list facility of destination and waste of concern [\$268.8(a)(2)] (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [\$268.7(a)(2)]? Yes (iii) Has the generator retained a copy of the demonstration on site [\$268.8(a)(3)-(a)(4)? Yes No* (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)] Yes

		Handler Name: ID Number: Inspector: Date:
		Connents
(v)	tion to the receiving facility intial shipment of the waste	
(vi	dated the certification, has the tor ceased shipment of the wast records indicate that the gener informed all receiving faciliti invalidation [§268.8(b)(3)]?	e genera- e and do ator has
Storage of I	Prohibited Vaste	
1. Vere prodays?	phibited wastes stored for greater	than 90 es No
	was facility operating as a TSD ustatus or final permit [§262.34(b	
If yes,	TSDF Checklist must be completed.	
(i.e., boild vater treat) 1. Vere tre	ers, furnaces, distillation units, ment tanks, etc.) eatment residuals generated from Research units or processes?	vaste-
If yes,	list type of treatment unit and p	processes
If yes,	TSDF checklist must be completed. The is not a suspect offer it is general	t to any treatment

RCRA INSPECTION TRACKING

EPA ID number (Mandatory (Y/N) Name/AKA (The	Dog 68737	24	> [ue fo	or Ins	spect:	ion ir	n Fiac	al Qua	Tand Ban (Y/N)
Contact name/phon Regulatory Status Date regulatory s	ne (AR	THR	(4	PLI	4 7 0°C+	A				(35 (-8800 Land Ban (Y/N) Y
Street, City, St. County/Municiple	code 20 ~	016	R 57	<u> </u>	_ tz	-12	4-12-2	2711/	- <i>N</i> -J.	8/20/
VHT Facility numb	per /55/200			File	numb	er _				Region code
Inspection date	<1/21/81	_>		Incid	ent c	ase n	umber			Quarter
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		GW						LDB		- Company (Seption
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RCRA INSPECTION TRACKING

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Regulatory State	na Or									Land Ban (Y/N)
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HT Facility nu	mber	- 		File	numb	er _				Region codeM
inspection date	(-F-17-13	ō-Τ›		Incid	ient c	sse n	umber			Uuarter
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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF HAZARDOUS WASTE MANAGEMENT HAZARDOUS WASTE INSPECTION REPORT

DWM-029



GENERATOR INSPECTION REPORT

FACILITY INFORMATION
FACILITY NAME: THE THOMAS & BETTS CO
FILE NUMBER:
VHT FACILITY FILE NUMBER:
PERMIT #:
REGION: M
INSPECTION DATE: Jan. 27. 89
INCIDENT/CASE NUMBER:
INSPECTION TYPE: GEN/LB
RESPONSIBLE AGENCY CODE: 5
INSPECTOR'S NAME: B. CZACHOR D. BURGOYNE
INSPECTOR'S AGENCY: DHWM
INSPECTOR'S BUREAU: BFO - M
EPA ID NUMBER: P) 096873724
ADDRESS: 36 BUTLER STR
ELIZHBETH, N.7.07206
LOT: 02, 62, BLOCK: 2
COUNTY: UNION
FACILITY PERSONNEL: ARTHUR MALANGA - ENVIRON. ENG.
TELEPHONE 1: LOI-351- X800 OTHER STATE/EPA PERSONNEL: BURGOYNE DANIEL-NJ.DE
OTHER STATE/EPA PERSONNEL: BURGOYNE DAN IEL-NJ.DE
REPORT PREPARED BY: BOLESLAW CZACHOR
REVIEWED BY: BOLESLAW CHECKER REVIEWED BY: MITCHING

REVISION: 3 Ø1/88

DATE OF REVIEW:

TIME IN: 1120	•		
TIME OUT:			
PHOTOS TAKEN () YES	(S) NO	IF YES, HOW MANY?	MA
SAMPLE TAKEN () YES	(<u>U</u> /NO	NO. OF SAMPLES	MA
	÷	NJDEP SAMPLE ID#:	NA
MANIFESTS REVIEWED (V) YES () 1	NO	·
Number of manifests	in compliance	106	
Number of manifests	not in complian	nce	•
List manifest compliance.	document num	bers of those man	nifests not in

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:
The Thomas & BETTS GRP., located in
ELIZABETH, N.J. will the EPA original ID
number NJD096873724 is a monnfocturer
I metal components for electronic instrustry.
The manufactions process involves an operation,
as Morring: metal stamping, electroplating,
in end buishing unmaching metal messing.
entting monetal tooling. Bosic metals
used in production one steel, moleoble
ivon and aluminum, and electropleting
oporations are done mostly with zine oul
chronium.
The har work our generated primerly
in metal parts degressing operations, I
where nopho is used on the worke type
Dool is generated. The company & ceased
usage of long solvents since flore subston_
cees one which highly regulated. The manage-
went of weephto should and Dool worked
is completter provided by Sofety-Kleen Corp.
The second hource of lor worke generated
on gite is the w/w treatment plant for
worke water from He electroplating operations.
The highly odrance w/w Veothent plant

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):
is designed that eleon water is discharged
into the public rewer Joint Meeting perhit
M0150) and sludge is mu of Albough
into the public rewer Joint Meeting perhit # M0150) on sludge is mu follough liter press on dryier then it is drawned up into 55 CH obrums and disposed of site
up intel 55 CH drums and disposed of site
is took worte. This ture of worte poes to
the Michigan Disposell Co. WAYNE MI.
The some some ournerts of Dooz
are penevotal in electroploting operations.
The med moditing speritions results in
renevation . L wither entiry oils and
work lubricating oils, X720, this type
of worke is disposed of site with the The
FLOWEN oir Co. from Counder N.J. The
company spende two obsveround waste
pil storkegt touk, ene of 2500 GAL
copacity is used for waste lubricating oil
which Is at higher purched, the second
Jone of Jaso Othe copacity is used
my vaxture of oil and water (on Hing oil).
Both touter lappeared to be in polit
condition, diken our property operated,
however I wonced hat honory
had no written approval to opente
711

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):
there tonks how the BHWE, as per
M7Ae7:26-9.3(b);
The physical inspection of the facility
reveoled that it hos in good housekdeping
and good management of hor. worke
continuers which were in storage. Also
the inspection of the obscumentation of required
under the RERA reverled that it was
in substantial compliance with the N.J. Hor.
Worte Regulations, exept that there was
no domnement Hot emergency response
drills were conducted on per NATE 7:26 -
9-4618:
Also it should be noticed that company
is a subject to LTSK regulations because
the listed Food work is generated on
site.
The company itses not have a post
history records I'm this office.
· ·

Ar P		G-5
	-B-	
	Describe the activities that result in the generation of bazard - electropleting perotions - metal parts blegressing speration; - metal modhining operation; - maintenance operation;	ous Waste.
	Identify the hazardous waste located on site, and estimate the quantities of each. (Identify Waste Codes) D002-11 DRMM3 F006-18 DRVMS X726-N 10006AL	e approximate
•		

	GENERAL CHECKLIST			
GENERAL		YES	NO N/A	
7:26-7.4(a)1	Does the Generator have an EPA ID number?	X		_
HAZARDOUS WASTE DET	ERMINATION			
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	×		_
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	×	· -	
	Is the waste hazardous?	X		_
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	×		
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).			
	_	/		
7:26-7.4(a)41	The generator's name, address and phone number.	×	_	
7:26-7.4(a)411	The generator's EPA ID number.	¥		
7:26-7.4(a)4111	The hauler(s) name, address phone number and NJ registration.	×		
7:26-7.4(a)41v	The hauler(s) EPA ID number.	×		
7:26-7.4(a)4 v	The name, address and phone number of the designated TSD facility.	×		_
7:26-7.4(a)4vi	The TSF's EPA ID number.	X		
7:26-7.4(a)4v	The name, eddress and phone number of the designated TSD facility.	<u>X</u>		
7:26-7.4(e)4v11	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	X		
7:26-7.4(a)4v111	Special handling instructions and any other information required on the form to be shipped by generator?	<i>_</i> ×		

		YES 1	NO N/A	
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	X		
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	×		_
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	×		
7:26-7.4(a)5i	Sign the manifest certification by hand?	×		
7:26-7.4(a)511	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	X		
7:26-7.4(m)5111	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	K		
7:26-7.4(a)51v	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	<u>×</u>		_
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	¥		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	×	_	_
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	×		_
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDE of the situation?	, P		*
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	d 		×

7:26-9.3	Accumulation Time
	How is waste accumulated on site? (Containers Tanks (greater than 90 days) (complete HWMF (TSD) Facility Checklist) Tanks (less than 90 days) Above ground 5000 CAL Below ground 2500 CAL Surface impoundments (complete HWMF (TSD) Facility Checklist) Piles (complete HWMF checklist)
7:26-9.3(a)1	YES NO N/A Is waste accumulated for more than 90 days?

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

Containers		YES	NO	<u>N/A</u>
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone). [[-DRJM) - D002			
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	\preceq		
	If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)41	Are all containers securely closed except those in use?	\times	_	_
7:26-9.4(d)4111	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?	\times		
7:26-9.4(d)41v	Are containerized hazardous wastes segregated in storage by waste type?	×	_	_
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	\times		_
7:26-9.4(d)5	Is the container storage area inspected at least daily?	×		
7:26-9.4(d)6	Are containers holding ignitable and reactive wastea located at least 50 (fifty) feet (15 meters) from the facilities property line?			_
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?			·
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?			

		YES	<u>NO</u>	N/A	
7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)	×		_	_
Tanks (Less than 90	day storage)				
7:26-9.3(b)	Does the generator accumulate hazardous waste on-site in an above ground tank?	X	·		
	If yes, describe the tank(s): 1) Capacity 5000 CAZ 2) Shell thickness 3) Material Construction 5 CO 4) Age of tank	l in	sul	Je	مأ
7:26-9.3(b)	Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?		<u>ح</u> ر .	<	
7:26-9.3(b)1	Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?	×	, 	-	
7:26-9.3(b)4	Is the tenk(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?	×	< _	_	
7:26-9.3(b)5	Is each tenk(s) rendered empty (1% or less remaining) every 90 days or less?	×		_	_
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in en on-site, authorized facility?	, _×	<u> </u>	_	
7:26-9.3(ъ)8	If part of the tank is below grade, is it constructed to ellow visual inspection of the tank, comparable to a totally above-ground tank and is secondary containment provided for the below grade part?				<u>×</u>
7:26-10.5(e)1	Are materials which are incompatible with the material of construction of the tank(e) placed in the tank(s)?			¥	
7:26-10.5(c)2	Does the generator use appropriate controls and practices to prevent overfilling? Topolore and red	X Li.	ghot -	-	_

		VEC	NO	N /A	
7:26-10.5(c)211	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?	123	<u></u>	<u>N/A</u>	<u> </u>
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	X			
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, lesks, and precipitation?	×			
7:26-10.5(d)11	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	. ×	<u> </u>		
7.26-10.5(d)11	Does the containment system consist of material compatible with the wastes being stored?	×	.	_	_
7:26010.5(d)111	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?	· <u>×</u>			
7:26-10.5(d)111	Is the tank protected from contact with accumulated liquids?	<u>_</u> ×			
7:26-10.5(d)1v	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	×	<u> </u>		
7:26-10.5(d)2	Is run-on into the containment area prevented?		, -		_
	If not, explain.				
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?	×	,		
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	×			

		YES NO	N/A	
7:26-10.5(d)41	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?	×		_
7:26-9.4(g)4	Personnel Training			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	*	deplication	_
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	$\not\succeq$	_	
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	×		_
	Is there written documentation of the following:			
7:26-9.4(g)61	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	×		_
7:26-9.4(g)611	A written job description for each position related to hazardous waste management?	×		_
7:26-9.4(g)6111	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management			
7:26-9.4(g)61v	Documentation of actual training or experience received by personnel?	×		_
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?			
	Smd to Are set !	X		

YES NO N/A

7:26-9.6	Preparedness and prevention			
	Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-96(b)1	An internal communications or alarm system?	X	_	_
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	\times		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	×		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?	×	_	
7:26-9.6(c)	Is equipment tested and maintained?			
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?	×	_	_
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	×	_	_
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	×		- Allengere
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type waste handled on site:	\Rightarrow		
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.	\times		_
		, ~		

YES NO N/A

7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?			$\overline{\lambda}$
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplies?	×	_	_
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, amplosion, or discharges at the facility?	×		_
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	×		_
7:26-9.6(f)6	If authorities identified in (f)l through 5, above decline to anter into auch arrangements, has the owner, or operator documented this refusal in the operating record.			×
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?		×	
7:26-9.4(g)81	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?	_		——
7:26-9.4(g)811	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?		$\overline{\times}$	
	If yes, did the owner operator pro- vide those specific local officials with written approval of the			×

7:26~9.7	Contingency Plan and Emergency Procedures	
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?	×
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	×
7:26-9.7(c)	Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	<u>×</u> _
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.	X
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this aection?	×
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	<u>×</u>

ſ

7:26-9.7(f)

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?

×___

7:26-9.7(g)

Does the plan include a list of all emergency equipment at the facility (such as fire axtinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?

X___

7:26-9.7(h)

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)?

X___

7:26-9.7(1)

Is a copy of the contingency plan and all revisions to the plan:

Maintained at the facility;

 \times ___

2. Has the contingency plan been aubmitted to local authorities (police fire departments, emergency response teams)?

X___

7:26-9.7(k)

Is there an employes on site or on call at all times with the responsibility of coordinating, all emergency response measures?

X

Inspector: B. CZACHOR

Address: 2343CHOR PL:

SKANCE

Telephone No: 261-661-3960

RCRA LAND DISPOSAL RESTRICTION GENERATOR CHECKLIST

I.	HANDLER IDENTIFICATION	
	The Thomas: BETTS CORP. 36 BUTL	ER STR
	nandler name B. Street (or	other identifier
-	ELIZABETH, N 07207 City D. State E. Zip Code	UNION
Ċ.	City D. State E. Zip Code	F. County Name
	City D. State E. Zip Code monufacturer of metal parts prelectronic industry. Natural of Business; Identification of Operations: SIC Code(s)	
Ğ.	Nature of Busines; Identification of Operations: SIC Code(s)	
	ND 096873724 EPA 10	
H.		
	ARTHUR MALANGA - ENVIR. ENG.	
I.	Handler Contact (Name and Phone Number)	
	COURT AND COURT TAKES	a
II.	GENERATOR COMPLIANCE	Comments
A.	Waste Identification	
	1. F-Solvents N/A	
	a. Does the handler generate the following wastes?	
	(1) F001, F002, F004, or F005 Yes No	
	(ii) F003YesNo	
	If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? YesNo	
	b. Source of the above: Form 8700-12 ; Part A ; Part B ; Biennial/Annual Reports // A	

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

			Handler Name: ID Number: Inspector: Date:
		d F-solvents, Appendix A-2 presents a list g P and W wastes. Note concerns belov:	of
2.	Dio	xin vastes N/A	
		Does the handler report the generation of following wastes? (The following industr may generate listed dioxin wastes: organ chemicals, pesticide or formulator.)	ies
[F-solve	nt B	(i) F020 - F023, F026 - F027 Yes (ii) F028 Yes DAT standards are presented as Appendix B	No UNO
3.	Cal	ifornia Waste Identification N/A	
	a.	Does the facility handle any of the followastes?	ving
		(i) D002 (ii) D004 - D011Yes	No No
[Califor		Does the generator handle any hazardous we characterized by high concentrations of high genated organic constituents (HOCs), metal cyanides? Yes vaste standards are presented as Appendix	alo- ls, or No
		Is the generator handling any of the F, K or U vastes subject to the "soft hammer" may qualify as California vastes due to H metals, or cyanide content? See Appendix a listing of California constituents like	, P, that OC, D for
	d.	test (Method 9095) [\$268.32(1)]?	ter No*
	e.	Has the generator conducted any testing of these hazardous wastes to determine wheth concentrations qualify the hazardous wast California wastes? Yes	er the
		If no, has the generator retained records menting his "applied knowledge" that the hazardous waste is not a California waste Yes	

			Randler Name: ID Number: Inspector: Date:
		If "no" is answered to both parts of this question, a violation is indicated. [§268	.7(a)]
		Describe the nature of the records:	
		f. Source of the above: Form 8700-12 ; ; Part B ; Biennial/Annual Report other (specify)	Part A M/A
	4.	First Third Waste Identification	
<u></u>		a. Does the generator handle any of the wast listed as First Third Wastes in \$268.10? Appendix E for listing. List First Third Wastes handled by the generator here: For G, Slunder from the With the sentence of the With the sentence of the With the Standard of the Waste Standard of	See
		b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If list those wastes:	
		c. Are any of the soft-hammered wastes Calif wastes (see Appendix G)? Yes If yes, the wastes must meet BDAT standar	No
		prior to disposal. ### A constraint of the con	
		e. Source of the above: Form 8700-12 ; ; Part B ; Biennial/Annual Report other (specify)	Part A
В.		T Treatability Group - Treatment Standards	
	1.	Does the generator mix restricted vastes with different treatment standards for constituent concern?	s of /
	2.	If yes, did the generator select the most str treatment standard for the constituent of con [§268.41(b)]? Yes	ingent cern No*

A potential violation is indicated

GEN-3

		Handler Name: ID Number: Inspector: Date:
3.	P Solvents N/A	
	a. Did the generator correctly determine the appropriate treatability group [\$268.41] waste (e.g., vastevaters containing solven nonvastevater (i.e., < 1% TOC), pharmace vastevaters containing spent methylene chloride, all other spent solvent vastes. Yes	of the vents, eutical
4.	California Wastes P/A-	
	a. Did the generator correctly determine the distinction between liquid hazardous van non-liquid hazardous vastes that contain in concentrations greater than 1,000 mg. [\$268.32(h)]?	stes and n HOCs
5.	First Third Wastes	
	a. Did the generator ascertain whether res wastes were appropriately assigned wast or nonvestewater designations (nonvestewater > 1% TOC and > 1% suspended solids) [§268.7(a)]?	evater vaters
	b. Does the facility handle KO61 wastes?Yes	<u></u>
	If yes, were nonvastewaters appropriate classified in either the high or low zi subcategories (>15% Zn) [\$268.7(a)] [\$268.41(a)]?	
	c. Does the facility handle K101 or K102 w	No No
	If yes, were nonwastewaters appropriate classified in either the high or low ar subcategories [\$268.7(a)] [\$268.41(a)]? Yes	senic
	d. Is there any reason to believe that the erator may have diluted the waste to ch applicable treatment standard (based on of process operation, pipe routing, poi sampling)? Yes	ange the review

 $\stackrel{{\scriptscriptstyle \star}}{-}{}^{\prime}$ A potential violation is indicated

					Inspector: Date:	
last	te A	ralysi	<u>.</u>			Comments
			enerator determine whether reatment standards based o			
	a.	Knovl	edge of vastes	Yes	No	
		(i)	List vastes for which "ap vas used:	plied know		
	ъ.	TCLP		Yes	No	
		(i)	List wastes for which "To	LP" vas us	ed:	
		(ii)	Appendix D lists wastes in ment standards are express trations in waste extract wastes handled by the gento waste extract standard using the TCLP? If yes, list:	sed as con . Vere an erator sub	icen- iy oject	
	c.	Total	vaste analysis	<u>√</u> Yes	No	
	d.		les vere retained, describ of applied knowledge dete			
		analy	termined by TCLP or total sis, provide date of last sting, and attach test res	test, free	quency	
		Dates	/frequency:		MA	
		Note tests	which wastes were subjecte :	ed to which	n ′ /∩	
		varia	any problems (e.g., inadection of waste composition ed knowledge)	generation		

Handler Name: ID Number:

 $\stackrel{\bullet}{-}$ A potential violation is indicated

			Handler Name: ID Number: Inspector: Date:
		e. Were wagtes tested using TCLP or total contuent analysis when a process or wastestre changed [\$264.13(a)(3)(i) or \$265.13(a)(3) Yes	am (i)]?
	2.	Did the restricted wastes exceed applicable trability group treatment standards upon generat [\$268.7(a)(1)]?	
		List those that exceeded standards: +006	
		List those that did not exceed standards: Po	NE
	3.	Did the generator dilute the waste or the trea residual so as to substitute for adequate trea [§268.3]	tment
D.	Han	nagemen (
	1.	Onsite management	
		a. Were restricted wastes managed onsite?Yes	No
		If no, go to "2".	
		b. For wastes that exceed treatment standards treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?	, vas
		If yes, TSDF checklist must be completed.	_
	2.	Offsite Management	
		a. If restricted wastes exceed treatment stan ards, did generator provide treatment faci notification with each shipment? [268.7(a)	lity
		(i) EPA Hazardous Vaste Number? Ves	No*
		(ii) Corresponding treatment standard?	No*
		(iii) Hanifest number?	No*
		(iv) Waste analysis, if available?	No

 $\stackrel{{\scriptscriptstyle \mathsf{L}}}{\sim}$ A potential violation is indicated

			Handler Name:	
Ide	entify (offsite treatment facilities EEVICE, WAYANDOT	E, MI.	Comments
b.	stand	stricted wastes do not exce ards, did generator provide ity with a notice and certi ding:	the disposal	
	(i)	EPA hazardous waste I.D.	number? YesNo*	
	(ii)	Corresponding treatment s	andard? YesNo*	
	(iii)	Manifest number	YesNo*	
	(iii)	Certification regarding valuets treatment standards		
Ide BDA	ntify T cert	land disposal facilities reified wastes	eceiving the	
c.	case exemp Apponention record	e generator's vaste is sub by case exemption, a \$268. tion, or a nationwide varied dix E for restricted vaste nwide variances), does the ds indicate that he or she waste shipment [\$268.7(a)(o "no migration" ance (see s subject to generator's submits with	
	(1)	EPA Hazardous Vaste Numbe	r? YesNo*	
	(11)	Corresponding Treatment S	tandards? YesNo*	
	(111)	All applicable prohibitio	ns? Yes No *	
	(iv)	The manifest number?	YesNo*	
	(v)	The date the wastes are s prohibitions?	ubject to YesNo*	
	(vi)	Does generator keep recornotifications/certificationsfite facilities?		

Handler Name: ID Number:	
Inspector:	
Date:	
<u></u>	

are no	all prohibited vastes for ot provided per above [§26	8.7(a)(b):	N/A
	ify TSDFs receiving any pr ct to any exemptions and v		astes U/A
does vaste	ndler generates a "soft ha the generator send with ea shipment to a TSDF and re ice that includes [268.7(a	ch "soft h tain copie	ammer"
The El	PA Hazardous Vaste Number?	Yes	No*
Appli	cable prohibitions?	Yes	No*
The ma	anifest number?	Yes	No*
Vaste	analysis data, where avai	lable? Yes	No
(i)	Do the generator's record any soft-hammer wastes are disposed in a landfill or impoundment [§268.33(f)]?	e destined surface	
	If yes, list facility of waste of concern [§268.80		on and
(ii)	Has the generator submitted tions and certifications "soft-hammered" waste designated in landfill or sment to the Regional Admit to the shipment of waste [\$268.7(a)(2)]?	for each stined to burface implication	pe pound- prior
(iii)	Has the generator retained demonstration on site [§2 (a)(4)]?		
(iv)	Has the generator retains §268.8 certifications ser		rsdf /

(v) Did-the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [\$268.8(a)(3)-(a)(4)]?		Handler Name: ID Number: Inspector: Date:		
tion to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]?YesNo* (vi) If the Region:1 Administrator has invalidated the certification, has the generator coreased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? YesNo* Storage of Prohibited Waste 1. Were prohibited wastes stored for greater than 90 days?YesNo If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]?YesNo* If yes, TSDF Checklist must be completed. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)	Conner			
dated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [\$268.8(b)(3)]? YesNo* Storage of Prohibited Waste 1. Were prohibited wastes stored for greater than 90 days? If yes, was facility operating as a TSD under interim status or final permit [\$262.34(b)]? YesNo* If yes, TSDF Checklist must be completed. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.) 1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?YesNo If yes, list type of treatment unit and processes	2_	ion to the receiving facility upon the ntial shipment of the waste	(v)	
1. Vere prohibited vastes stored for greater than 90 days? If yes, was facility operating as a TSD under interim status or final permit [\$262.34(b)]? Yes No If yes, TSDF Checklist must be completed. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.) 1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? Yes No If yes, list type of treatment unit and processes		lated the certification, has the generator corceased shipment of the waste and do ecords indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]?	(vi)	
If yes, was facility operating as a TSD under interim status or final permit [\$262.34(b)]? YesNo* If yes, TSDF Checklist must be completed. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, waste-water treatment tanks, etc.) 1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?YesNo If yes, list type of treatment unit and processes		ibited Vaste	torage of Pr	Sto
If yes, TSDF Checklist must be completed. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.) 1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? Yes No If yes, list type of treatment unit and processes				1.
Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, waste- water treatment tanks, etc.) 1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? Yes No If yes, list type of treatment unit and processes		tus or final permit [§262.34(b)]?		
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.) 1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? Yes No If yes, list type of treatment unit and processes		F Checklist must be completed.	If yes, T	
264/265 exempt units or processes? Yes No If yes, list type of treatment unit and processes		furnaces, distillation units, waste- tanks, etc.)	i.e., boiler ater treatme	(i.e
		-		1.
If yes, TSDF checklist must be completed. The unite is not a subject to any treat		t type of treatment unit and processes	If yes, l	
If yes, TSDF checklist must be completed. The worke is not a subject to any treat				
The worke is not a subject to any treat				
11 11 11 20 20 20 20 20 20	restment	e is not a subject to any	If yes, The wo	71

RCRA INSPECTION TRACKING

O Tile J

County/Municiple VHT Facility numb Inspection date	code 26 er <1/27/8-	UY	<u> </u>	to 617	A-122	<u> </u>	ter 3-14 35 (- 8800) and Ban (Y/N) Y b 7207 Region code
cumanted -	02/06/87		AREA	OF EVALUA	TION		
CLASS OF . VIOLATION	I*	11	-	' ' 	0	!! !	Enf. action date: Sched. compliance: Actual compliance:
AREAS OF EVALUATION = Ground Water SCH = Compliance Grant inspection Record review cook Responsible Agency Inspectors last ragency Acronym Comment 7	CLO = Schedule type code	MNF = Man	ıfest	LDB =	Land	ban OTH	= other
							number
Violation Code X Violator Priorit Violation Referr Referral Date < Violation Code < Violation Referr Referral Date < Violation Code < Violation Code < Violation Code < Violation Referr Violation Referr Referral Date <	ed to (y (nigh, free ed to (y thigh, flee ed to (\$	Respondance (Respondance (Respo	nce Date (>

RCRA INSPECTION TRACKING

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		EN CLO			ALUATIO		o own	
CLASS OF	I*	GW CLO	- 1	·	i	. !	[†] ¹	Enf. action date: 1/27/8%
VIOLATION	I	 	{ -	 	X	. !	¹ ¹	Sched. compliance: 2/ /87 Actual compliance: n=u=
	II				X	l !		
AREAS OF EVALUATION GW = Ground Water								
Inspectors last n Agency Acronym Comment	7 TTW	<u> </u>	40C	Bure	au acro	nym _	BFO	
		_ Dat	.e 158u	ed			Badge	number
Summons Status co	de	Penalty	collec	ted			Date r	esolved
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NEW JERSEY PARTMENT OF ENVIRONMENTAL TOTECTION DIVISION OF HAZARDOUS WASTE MANAGENANT HAZARDOUS WASTE INSPECTION REPORT

DWM-029

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: THE THOMAS & BETTS CO
FILE NUMBER:
VHT FACILITY FILE NUMBER:
PERMIT #:
REGION: M
INSPECTION DATE: Jan. 27. 89
INCIDENT/CASE NUMBER:
INSPECTION TYPE: GEN/LB
RESPONSIBLE AGENCY CODE:
INSPECTOR'S NAME: B. CZACHOR D. BURGOYNE
INSPECTOR'S AGENCY: DHWM
INSPECTOR'S BUREAU: BFO - M
EPA ID NUMBER: P) 096873724
ADDRESS: 36 BUTLER STR
ELIZABETH, NJ.07206
LOT: 02,82, BLOCK: 2
COUNTY: UNION
FACILITY PERSONNEL: ARTHUR MALANGA - EN MRIT. ENG.
TELEPHONE #: 101-351-8800
OTHER STATE/EPA PERSONNEL: BURGOYNE DAW IEL-NJ. 969
REPORT PREPARED BY: BOLESLAW CZACITUR
REVIEWED BY: ASterling
DATE OF REVIEW: 2/15/89

REVISION: 3 Ø1/88

TIME IN: 1190	-		
TIME OUT:	-		
PHOTOS TAKEN () YES		IF YES, HOW MANY?	MA
SAMPLE TAKEN () YES	(L) NO	NO. OF SAMPLES	MA
		NJDEP SAMPLE ID#: _	NA
manifests reviewed ($\sqrt{}$	YES () N	0	,
Number of manifests	in compliance	106	
Number of manifests	not in compliane		
List manifest compliance.	t document numb	pers of those man	lfests not in

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:
The Thomas : BETTS CORP., located in
ELIZABETH N.J. with the EPA ossigned ID
number NJO096873724 is a monifocturer
I metal components for electronic inclustry.
The manufactoring process involves an operation,
as planing: metal stamping, electroplating,
med history umodring metal pressing,
entting monetal tooling. Bosic metals
used in publichen whe steel moleable
iron and aluminum and electropleting
operations are done mostly with zine oul
chromium.
The how work one generated primerly
in metal parts degreesing operations, I
where napha is used and the write type
Dool is generated. The company & ceased
usage of lang solvents since those subston_
cees ove behind highly regulated. The manage-
went of volephto should and Dool world
is completely provided by Safety-Kleen Corp.
The second houve of wir worke generated
or gite is the w/w treatment plant for
worke water from He electroplating operations
The highly odonce I/w Vertheut Tolont

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):
is designed that clean water is discharged
into the public rewer Joint Meeting perhit
MOISON and shirted is now & Allongh
filter press and draier then it is drawned
up intel 55 CH drums and disposed of site
or Foob worte. This type of worte poes of
the Midigan Disposel Co. WATNE MI.
the Midigan Disposal Co. WAYNE MI. The books some amounts of DOOZ
are senevated in electroploping operations.
The med moditing operations results in
generation I write entiry oils and
Corte lubricating oils, X728, this type
FLOWEN oir Co. from Counder N.J. The
company sperate two obsequents work
pil storkeye touk, ene af 2500 GAL
copacity is used for waste Rubricating oil
which to of higher endity, the second
Jone of food offer consoling is used
Storege fire oil and water (on thing oil).
Both touter toppeared to be in polis
condition, diken our property ophereter,
however I nonced had bedurong
had no written approval to opente

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):
those tonks how the BHWE as per
MTAe.7:26-9.3(b);
The physical inspection of the facility
reveoled that it has in good housekdeping
and good management of hor worke I
continers which were in storage. Also
the inspection of the observementation of requires
under the RERA reverted that it was
in substructed compliance with the N.7- Hor.
Worte Regulations, exent that there was
no obsumentan Hot emergence, response
drills were conducted on per NATE 7:26 -
9-468:
Also it should be noticed that company
is a subject to LBK regulations becombe
the listed Food wish is generated on
site.
The company itses not have a post
history records I'm this office.

Describe the activities that result in the generation of hazardous waste.
- electroploting perotions
- metal parts blegreesing operation;
met modining operation.
- maintenance operation,
<u> </u>
Identify the hazardous waste located on site, and estimate the approximate
quantities of each. (Identify Waste Codes)
DOOR- 11 DRUMS
FOOG - 18 DRIMS
X726-~ 1000GAL.
<u> </u>
· · · · ·

GENERAL	GENERAL CHECKLIST	YES	NO N/A	
7:26-7.4(a)1	Does the Generator have an EPA ID number?	×		
HAZARDOUS WASTE DET	TERMINATION	·		
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	×	_	
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	<u>×</u>		
	Is the waste hazardous?	X		_
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	×		******
MANIFESTS				
7:26-7.4(m)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	~		
7:26-7.4(a)41	The generator's name, address and phone number.	/-	_	
7:26-7.4(a)411	The generator's EPA ID number.	<i>_</i> \	-	_
7:26-7.4(a)4111	The hauler(s) name, address phone number and NJ registration.	✓ ×		
7:26-7.4(a)41 v	The hauler(s) EPA ID number.			
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	′ ∠	-	
7:26-7.4(a)4v1	The TSF's EPA ID number.	X		
7:26-7,4(a)4v	The name, address and phone number of the designated TSD facility.	X		
7:26-7.4(a)4v11	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	X		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	- ×		

		YES	NO	<u>n/a</u>	
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?		<u> </u>		_
7:26-7.4(a)1x	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	<i>;</i> *	<u> </u>		
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	<u>-</u> ;×	_		_
7:26-7.4(a)5i	Sign the manifest certification by hand?	_	<u> </u>		
7:26-7.4(a)511	Obtain the handwritten aignature of the initial transporter and date of acceptance on the manifest?	<u>\</u>	_		
7:26-7.4(a)5111	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	Ł	<u> </u>	_	
7:26-7.4(a)51v	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	×	, -	_	
7:26-7.4(a)5 v	Give the remaining copies of the manifest form to the hauler?	÷	_	_	_
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	¥	<u> </u>		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD fscility) of all manifesta for waste shipped off site more than 35 days ago?	<i>></i>	<u> </u>		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDE of the situation?	, -	_		*
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	! 		-	X

7:26-9.3	Accumulation Time How is waste accumulated on site? (X) Containers (Y) Tanks (greater than 90 days) (complete HWMF (TSD) Facility Checklist) (Y) Tanks (less than 90 days) (X) Above ground (Y) Above ground (Y) Above Ground (Y) Checklist (Y) Checklist (Complete HWMF (TSD) Facility Checklist) (Y) Piles (complete HWMF checklist)
7:26-9.3(a)1	YES NO N/A Is waste accumulated for more than 90 days?

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

Containers		YES	NO	<u>n/a</u>
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of			
7:26-9.4(d)2	waste acetone). (- DRUM) - D002 5 - 1 - For 6 Do the containers appear to be in good condition, not in danger of leaking?	<u> </u>	_	
	If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)41	Are all containers securely closed except those in use?	\times		_
7:26-9.4(d)4111	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?	\times	_	
7:26-9.4(d)41v	Are containerized hazardous wastes segregated in storage by waste type?	×	_	
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?	\times	_	
7:26-9.4(d)5	Is the container storage area inspected at least daily?	×		
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?			
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?			
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?			

Doea the generator use appropriate controls and practices to prevent

sprotorm and red

overfilling?

7:26-10.5(c)2

		YES	NO N/	A
7:26-10.5(c)211	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?	_	_	<u>×</u>
7:26-9.3(b)3	Does each tank(s) or storage tank area have secondary containment?	X	_	
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	×	_	
7:26-10.5(d)11	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	` <u>×</u>	,	
7.26-10.5(d)11	Does the containment system consist of material compatible with the wastes being stored?	· ×	_	
7:26010.5(d)111	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?	· <u>×</u>	_	
7:26-10.5(d)111	Is the tank protected from contact with accumulated liquids?	X	_	
7:26-10.5(d)1v	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	×	·	
7:26-10.5(d)2	Is run-on into the containment area prevented?	×		
	If not, explain.			
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blocksga or overflow of the collection system?	×		
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	×		

		YES NO	N/A	
7:26-10.5(d)41	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?	×		
7:26-9.4(g)4	Personnel Training			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	*	_	
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?	$ \rightthreetimes $		_
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	×		
	Is there written documentation of the following:			
7:26-9.4(g)61	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	×		
7:26-9.4(g)611	A written job description for each position related to hazardous waste management?	×		_
7:26-9.4(g)6111	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management	· 💉		
7:26-9.4(g)61v	Documentation of actual training or experience received by personnel?	×	_	_
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of	\ <u>/</u>		
	employment?	- X		

YES NO N/A 7:26-9.6 Preparedness and prevention Does the facility comply with preparedness and prevention requirements including maintaining: 7:26-96(b)1 An internal communications or alarm system? 7:26-9.6(b)2 A telephone or other device to summon amergency assistance from local authorities? 7:26-9.6(b)3 Portable fire equipment, apill control equipment, and decontamination equipment? 7:26-9.6(b)4 Water at adequata volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water apray system? 7:26-9.6(c) Is equipment tested and maintained? 7:26-9.6(d)1Is there immediate access to communications or alarm systems during systems during handling of hazardous waste? 7:26-9.6(e) Adequate sisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment? If no, please explain. In your opinion, do the types of waste on site require all of the above procedures, or are some not required? Explain. 7:26-9.6(f) Has the facility made the following arrangements, as appropriate for the type waste handled on site: 7:26-9.6(f)1 Familiarize police, fire departments and emergency response teams with the layout of the facility and hezardous waste handled - associated hazardous

places where facility personnel would normally be working, entrances and roads inside facility and possible

evacuation routes.

	YE	s no	N/A	
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?			\preceq
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplies?	×		_
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	×		
7:26-9.6(f)5	Arrangement with local fire departments to inepect the facility on a regular basis with at least two (2) inspections annually?	×		_
7:26-9.6(f)6	If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.	<u></u>		×
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriete local authorities to test emergency response capabilities at the fecility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?		×	
7:26-9.4(g)81	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?	-	´´ ★	
7:26-9.4(g)811	Did the owner or operator petition the Department for an exemption excluding some or all local officiels in the semi annual drill requirements?	·	$\overline{\times}$	
	If yes, did the owner operator provide those specific local officials with written approval of the exemption?			$\not\succeq$

7:26-9.7	Contingency Plan and Emergency Procedures	
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?	×
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	×
7:26-9.7(c)	Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, eoil, or surface water at the facility?	×
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 at seq.	X
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are aufficient to comply with the requirements of this section?	×
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contrectors, and State and local emergency response teams to coordinate emergency services?	×

7:26-9.7(f)

Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?

7:26-9.7(g)

Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?

7:26-9.7(h)

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe aignal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)?

7:26-9.7(1)

Is a copy of the contingency plan and all revisions to the plan:

- Maintained at the facility;
- 2. Has the contingency plen been submitted to local authorities (police fire departments, emergency response teams)?

7:26-9.7(k)

Is there an employee on aite or on call at all times with the responsibility of coordinating, all emergency response measures? ×--

X__

.

X___

Inspector: B. CZACHUL

Address: 2 3432 BCK PL:

ORANGE

Telephone No: 261-669-3960

RCRA LAND DISPOSAL RESTRICTION GENERATOR CHECKLIST

I.	HANDLER IDENTIFICATION		
	The Thomas: BETTS CORP.	36 BUTL	ER STR
Ā.	Handler Name	B. Street (or	other identifier)
ī	ELIZABETH, N OT CITY D. State E.	1207	UNION
C.	City D. State E.	Zip Code	F. County Name
	Maturel of Business; Identification of Operations: SI	rie industry.	
G.	Nature of Business; Identification of Operations: SI	C Code(s)	
	NN096873724 EPA ID (
H.			
	ARTHUR MALANGA - ENVIR. ENG.		
Ī.	Handler Contact (Name and Phone Number)		
II.	GENERATOR COMPLIANCE		Comments
A.	Waste Identification		
	1. F-Solvents N/A		
	 Does the handler generate the following was 	ites?	
	(1) F001, F002, F004, or F005Yes	<u>/</u> no	
	(ii) F003 Yes <u>V</u>	No	
	If an F003 vastestream (listed solely for ignitability) has been mixed with a non-restrict solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristicYes	c? /	
	b. Source of the above: Form 8700-12 ; Part B ; Biennial/Annual Reports other (specify)		

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

			Han Name: ID Number: Inspector: Date:
		ed F-solvents, Appendix A-2 presents a list og P and W wastes. Note concerns belov:	of
2.	Die	oxin vastes N/A	
	a .		ries
[P-solve	nt 1	(i) F020 - F023, F026 - F027 Yes (ii) F028 Yes DLT standards are presented as Appendix B	No No
		ifornia Waste Identification N/A	
	a.	Does the facility handle any of the followastes?	owing
		(i) D002 (ii) D004 - D011Yes	No No
[Califor	b.	Does the generator handle any hazardous characterized by high concentrations of genated organic constituents (HOCs), met cyanides? Veste standards are presented as Appendix	halo- als, or No
	c.	Is the generator handling any of the F, or U wastes subject to the "soft hammer" may qualify as California wastes due to metals, or cyanide content? See Appendia listing of California constituents lik	K, P, that HOC, x D for
	d.	Has the generator conducted the paint fitest (Method 9095) [\$268.32(1)]?Yes	,
	e.	Has the generator conducted any testing these hazardous wastes to determine whet concentrations qualify the hazardous was California wastes? Yes	her the
		If no, has the generator retained record menting his "applied knowledge" that the hazardous waste is not a California wastYes	e?

Handler Name: ID Number:	
Inspector:	

		If "no" is answered to both parts of this question, & violation is indicated. [§268.7(a)]
		Describe the nature of the records: NA
		f. Source of the above: Form 8700-12 ; Part A property; Part B ; Biennial/Annual Report; Part A property; Part B ; Part B
	4.	First Third Waste Identification
	~	a. Does the generator handle any of the wastes listed as First Third Wastes in \$268.10? See Appendix E for listing. List First Third Wastes handled by the generator here: +006, sludge for the W/W
)		> trotment plant.
	-	b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:
		c. Are any of the soft-hammered wastes California wastes (see Appendix G)? Yes No
		If yes, the vastes must meet BDAT standards prior to disposal. γ / β
		d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? Yes No*
		e. Source of the above: Form 8700-12; Part A ; Part B; Biennial/Annual Report; other (specify);
В.	BDA1	T Treatability Group - Treatment Standards
	1.	Does the generator mix restricted wastes with different treatment standards for constituents of concern? Yes No
	2.	If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? **Mark Landard** Yes No**
=/ A	pot€	ential violation is indicated GEN-3

Handler Name: ID Number: Inspector:	· · ·
Date:	Comments

3. P Solvents - - NIA

a. Did the generator correctly determine the appropriate treatability group [\$268.41] of the vaste (e.g., vastevaters containing solvents, nonvastevater (i.e., < 1% TOC), pharmaceutical vastevaters containing spent methylene chloride, all other spent solvent vastes)?

___Yes ___No

- 4. California Wastes P/A
 - a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?

Yes No*

- 5. First Third Vastes
 - a. Did the generator ascertain whether restricted vastes were appropriately assigned vastewater or nonvastewater designations (nonvastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?
 - b. Does the facility handle K061 wastes?
 Yes No

If yes, were nonwastevaters appropriately classified in either the high or low zinc subcategories (>15% Zn) [\$268.7(a)] [\$268.41(a)]? Yes No

c. Does the facility handle K101 or K102 wastes?
__Yes ___No

If yes, were nonvastewaters appropriately classified in either the high or low arsenic subcategories [\$268.7(a)] [\$268.41(a)]?

____Yes ______Nos

d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?

Yes No

⁻ A potential violation is indicated

•			enerator determine whether the waste reatment standards based on \$268.7(a):
	8.	Knowl	edge of wastesNo
		(i)	List vastes for which "applied knowledge" vas used:
	ь.	TCLP	YesNo
		(i)	List wastes for which "TCLP" was used:
		(11)	Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? Yes No
	c.	Total	veste analysis VYes No
	d.		les vere retained, describe content and of applied knowledge determination:
		analy	termined by TCLP or total constituent sis, provide date of last test, frequency sting, and attach test results.
		Dates	/frequency:
		Note tests	which wastes were subjected to which

Handler Name:

		Inspect Date: _
		e. Were wagtes tested using TCLP or total constituent analysis when a process or wastestream changed [\$264.13(a)(3)(i) or \$265.13(a)(3)(i)]? Yes No*
	2.	Did the restricted wastes exceed applicable treat- ability group treatment standards upon generation [§268.7(a)(1)]?
		List those that exceeded standards: +006;
		List those that did not exceed standards: NUNE
	3.	Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] Yes* No
D.	Han	agement
	1.	Onsite management
		a. Vere restricted wastes managed onsite? Yes No
		If no, go to "2".
		b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted? Yes No
		If yes, TSDF checklist must be completed.
	2.	Offsite Hanagement
		a. If restricted wastes exceed treatment stand- ards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:
		(i) RPA Hazardous Vaste Number? Ves No*
		(ii) Corresponding treatment standard? Yes No*
		(iii) Manifest number?
		(iv) Waste analysis, if available? YesNo

 $\frac{1}{2}$ A potential violation is indicated

GEN-6

Handier Name:
ID Number:

Handler Name:	
ID Number:	
Inspector:	
Date:	

Identify MET	offsite treatment facilities	E, MI	<u>n – </u>	
stand facil	estricted wastes do not excellards, did generator provided ity with a notice and certifieding:	the dispo		
(i)	EPA hazardous waste I.D. n	number?	No*	
(ii)	Corresponding treatment st	andard? Yes	No*	
(iii)	Manifest number	Yes	No*	
(iii)	Certification regarding va			
Identify BDAT cert	land disposal facilities reified wastes	eceiving t	he	
exemp Appor natio recor	by case exemption, a \$268.6 tion, or a nationwide variable to the stricted wastern to the stricted variances, does the state of the stricted that he or she waste shipment \$268.7(a)	ance (see s subject generator submits v	to N/A	
	EPA Hazardous Waste Number	?		
		Yes	No*	
(ii)	Corresponding Treatment S		No*	
	Corresponding Treatment Someone Some	tandards?		
(iii)		tandards? Yes	No*	
(iii)) All applicable prohibition	tandards? Yes Yes Yes Yes	No*	

Handler Name:	
ID Number:	
Inspector:	
Date:	

	all prohibited wastes for provided per above [§]		rds N/A
	ify TSDFs receiving any ct to any exemptions and		astes JA
does t vaste	ndler generates a "soft the generator send with a shipment to a TSDF and ice that includes [268.7]	each "soft ha retain copie	ammer"
The El	PA Hazardous Vaste Numbe	r?Yes	No*
Applic	cable prohibitions?	Yes	No*
The ma	anifest number?	Yes	No*
Vaste	analysis data, where av	ailable? Yes	No
(i)	Do the generator's reco any soft-hammer wastes disposed in a landfill impoundment [§268.33(f)	are destined or surface	
	If yes, list facility o waste of concern [§268.		$\frac{\mathcal{N}/\mathcal{A}}{\mathcal{A}}$
(ii)	Has the generator submitions and certification "soft-hammered" waste disposed in landfill or ment to the Regional Adto the shipment of wast [\$268.7(a)(2)]?	ns for each lestined to b surface imp lministrator	pe pound- prior ()//
(iii)	Has the generator retaindemonstration on site [(a)(4)]?		
(iv)	Has the generator retains \$268.8 certifications s		rsdf /

		ID Number: Inspector: Date:	
			Comments
	(v)	Did-the generator submit the demonstration to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]? YesNo*	
	(vi)	If the Region: 1 Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? Yes No*	
Sto	orage of Pr	ohibited Waste	
1.	Were proh days?	ibited wastes stored for greater than 90YesNo	
		as facility operating as a TSD under tatus or final permit [§262.34(b)]?YesNo*	
	If yes, T	SDF Checklist must be completed.	
(i.	.e., boiler	ng RCRA 264/265 Exempt Units or Processes s, furnaces, distillation units, vaste- ent tanks, etc.)	
1.		tment residuals generated from RCRA xempt units or processes? Yes No	
	If yes, 1	ist type of treatment unit and processes	
	76 7	SDF checklist must be completed. The is not a subject to any tree ofter it is generated.	

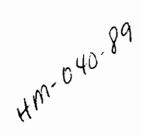
 $\dot{\boldsymbol{z}}'$ A potential violation is indicated

RCRA INSPECTION TRACKING

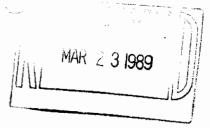
EPA ID number (NO) 873724 > Due for Inspection in Fiscal Quarter 3-89 Mandatory (Y/N) Name/AKA (The Thomas 3 5 5 Corp) Contact name/phone (ARTHNR (MHLANCA)) (35 (- 8800) Regulatory Status 0 Land Ban (Y/N) Y Date regulatory status changed Street, City, St. 212 36 BUTLER 57R, ELizaButh, N-1-0 7207 County/Municiple code 20 - 04 VHT Facility number File number Region code M Inspection date (1/27/84) Incident case number Quarter SUMMERIAL 02/06/89										
our member 02/06/89 AREA OF EVALUATION										
		Ğ₩	CLO	5\$\$	PTB	SCH	MNF	LDB	отн	
CLASS OF	I*		\ {	' !	' !	' 	' ! ی	' !	''	Enf. action date: 1/27/2 Sched. compliance: 1/25/5
VIOLATION	I	·	1	' !	' 	' !	0	Z	×	Actual compliance:
	II	'	' 	' 	' !	' 	0	' (
GW = Ground Water CLO = Closure 955 = Financial responsibility PTB = Part B SCH = Compliance Schedule MNF = Manifest LDB = Land ban OTH = other Grant inspection type code Ol Record review code Responsible Agency code S Inspectors last name Agency Acronym DHWM Bureau acronym BTLO - M Comment										
Summons Number Initial Evaluat: Summons Status	on Date	 Pena	Date lty co	i ssue Cour Dilect	ed rt Dam	 Le		-	Badge Date r	numberesolved
Violation Code (7.3(b)) Glass (I or II) Violator Priority (high, med, low) (Niph) Violation Referred to () Referral Date ()										
Violation Code (9,4(4) 8) Class (I or (II) Violator Priority (night, med, 60) (11) Violation Referred to () Response Date ()										
Violation Code (1. 14)8; Class (I or (I)) Violator Priority (high, (ed, low)) () Violation Referred to (
'Referral Date	9. 4 (g)	42	de i		nce d	ate (>
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RCRA INSPECTION TRACKING

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Name/AKA (T_	401/142 5	BETT	> Cor(?		>	<		(201- 351- 880c) Land Ban (Y/N) - Y
Contact name/pho	ne (AA	THUR	MALA	<i>164</i>				>	(201-351-880c)
Regulatory Statu	9 O_L							}	Land Ban (Y/N)\
Date regulatory Street, Sity, St	atatus chang	ged ጜሯቸ	LER 57	<u>-a-</u> .	E.	74	BAT	4	r).07207,
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Inspection date	Incid	ient c	: ss e n	umber			Region code[M		
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VIOLATION	I	1		1	! X	1	I .	1 1	Actual compliance: None
	II		<u> </u>	-	-	. '	-		
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State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Director 401 East State St. CN 028 Trenton, N.J. 08625-0028 (609)633-1408

20 MAR 1989

Lance R. Miller Deputy Director

Responsible Party Remedial Action

Deputy Director

Hazardous Waste Operations

Michele M. Putnam

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas & Betts Company 36 Butler Street Elizabeth, New Jersey 07207

ATTENTION: Arthur Malanga

Dear Mr. Malanga:

There is enclosed for service upon you an ADMINISTRATIVE ORDER AND NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT issued by the New Jersey Department of Environmental Protection pursuant to the provisions of the Solid Waste Management Act.

The Department is available to meet with the principals of the case to discuss the enclosed enforcement document. Should you desire such a meeting please contact Margaret Elsishans within 20 calendar days of receipt of this letter. This does not affect the time frame within which you may request an administrative hearing, under the Notice of Right to a Hearing provisions of the enclosed document.

Should you have any questions concerning this matter, please contact Margaret Elsishans at (609) 633-0708.

Sincerely.

Kar J. Delaney, Assistant Director

Wazardous Waste Enforcement

KJD/mte
Enclosure(s)

cc Health Department

Mayor's Office

Bureau of Compliance and Technical Services

Regional Field Office

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4m-040-89

Michele M. Putnam Deputy Director

Hazardous Waste Operations

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

John J. Trela, Ph.D., Director 401 East State St. CN 028 Trenton, N.J. 08625-0028 (609)633-1408

Deputy Director

Lance R. Miller

Responsible Party Remedial Action

20 MAR 1989

IN THE MATTER OF

Thomas & Betts Company

36 Butler Street

Elizabeth, New Jersey 07207

ADMINISTRATIVE ORDER

AND

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

This Administrative Order and Notice of Civil Administrative Penalty Assessment is issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (hereinafter "NJDEP" or the "Department") by N.J.S.A. 13:1D-1 et seq., and the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and duly delegated to the Assistant Director for Enforcement of the Division of Hazardous Waste Management pursuant to N.J.S.A. 13:1B-4.

FINDINGS

- The Department has determined that Thomas & Betts Company (hereinafter "Thomas & Betts") is a hazardous waste generator (EPA ID# NJD096873724) as defined in N.J.A.C. 7:26-1.4 and is located at Block 2, Lots 02 and 82, 36 Butler Street, Elizabeth City, Union County, State of New Jersey.
- 2. During the course of an inspection conducted on January 27, 1989, by a Department representative, the following violations were noted:
 - a. Thomas & Betts failed to obtain written approval from the Department prior to the accumulation of hazardous waste in two aboveground tanks for 90 days or less without a permit, in violation of N.J.A.C. 7:26-9.3(b).
 - b. Thomas & Betts failed to hold semi-annual drills involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures, in violation of N.J.A.C. 7:26-9.4(g)8.
- 3. Based on the facts set forth in these FINDINGS, the Department has determined that Thomas & Betts has violated the Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and the regulations promulgated pursuant thereto, N.J.A.C. 7:26-1 et seq., specifically N.J.A.C. 7:26-9.3(b) and 9.4(g)8.

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ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED THAT THOMAS & BETTS SHALL:

- 4. Immediately upon receipt of this Order, cease the accumulation of hazardous waste in the two aboveground tanks and begin storing hazardous waste in accordance with N.J.A.C. 7:26-9.3(a) until written approval is obtained from the Department for aboveground tank storage.
- 5. Within five (5) days receipt of this Order, make arrangements to conduct semi-annual drills involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures, in violation of N.J.A.C. 7:26-9.4(g)8.
- 6. Within twenty (20) calendar days upon receipt of this Order submit the enclosed VERIFICATION OF COMPLIANCE by certified mail, return receipt requested or by hand delivery to:

New Jersey Department of Environmental Protection Division of Hazardous Waste Management Bureau of Compliance and Technical Services CN 028 Trenton, NJ 08625 Attention: Margaret Elsishans

THIS ORDER SHALL BE EFFECTIVE UPON RECEIPT.

NOTICE OF CIVIL ADMINISTRATIVE PENALTY ASSESSMENT

- 7. Pursuant to N.J.S.A. 13:1E-9e and based upon the above FINDINGS, the Department has determined that a civil administrative penalty should be assessed against Thomas & Betts in the amount of \$1,000.00.
- 8. Payment of the penalty is due when a final order is issued by the Commissioner subsequent to a hearing, if any, or when this Notice of Civil Administrative Penalty assessment becomes a final order (see following paragraph). Payment shall be made by certified check payable to "Treasurer, State of New Jersey" and shall be submitted to:

New Jersey Department of Environmental Protection Division of Financial Management Planning and General Services Bureau of Revenue CN 402 Trenton, NJ 08625

9. If no request for a hearing is received within twenty (20) calendar days from receipt of this Notice of Civil Administrative Penalty Assessment, it

shall become a final order upon the twenty-first calendar day following its receipt and the penalty shall be due and payable.

NOTICE OF RIGHT TO A HEARING

10. Pursuant to N.J.S.A. 52:14B-1 et seq. and N.J.S.A. 13: 1E-9, Thomas & Betts is entitled to an administrative hearing. Any hearing request shall be delivered to the address below within twenty (20) calendar days from receipt of this Administrative Order and Notice of Civil Administrative Penalty Assessment.

Assistant Director for Enforcement
Division of Hazardous Waste Management
401 East State Street
CN 028
Trenton, New Jersey 08625
Attention: Karl J. Delaney, Assistant Director

- 11. Thomas & Betts shall, in its request for a hearing, furnish NJDEP with the following:
 - a. A statement of the legal authority and jurisdiction under which the hearing or action to be taken is to be held;
 - b. A reference to the particular sections of the statute and rules involved;
 - c. A short and plain statement of the matters of fact and law asserted; and
 - d. The provisions of this Administrative Order and Notice of Civil Administrative Penalty Assessment to which Thomas & Betts objects, the reasons for such objections, and any alternative provisions proposed.

GENERAL PROVISIONS

- 12. This Administrative Order and Notice of Civil Administrative Penalty Assessment is binding on Thomas & Betts its principals, directors, officers, agents, successors, assigns, any trustee in bankruptcy or other trustee, and any receiver appointed to a proceeding in law or equity.
- 13. Notice is given that violations of any statutes, rules or permits other than those herein cited may be cause for additional enforcement actions, either administrative or judicial. By issuing this Administrative Order and Notice of Civil Administrative Penalty Assessment the Department does not waive its right to initiate additional enforcement actions.
- 14. No obligations imposed by this Administrative Order and Notice of Civil Administrative Penalty Assessment (with the exception of paragraph seven (7) above) are intended to constitute a debt, damage claim, penalty or

other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations are imposed pursuant to the police powers of the State of New Jersey, intended to protect the public health, safety, welfare, and environment.

- 15. Notice is given that pursuant to N.J.S.A. 13:1E-9e, the Department is authorized to assess a civil administrative penalty of not more than \$25,000 for each violation and additional penalties of not more than \$2,500 for each day during which the violation continues after receipt of an administrative order from the Department.
- 16. Notice is further given that pursuant to N.J.S.A. 13:1E-9f, any person who violates N.J.S.A. 13:1E-1 et seq. or any code, rule, or regulation promulgated thereunder shall be liable to a penalty of not more than \$50,000 per day of such violation, and each day's continuance of the violation shall constitute a separate violation.
- 17. Notice is further given that pursuant to N.J.S.A. 13:1E-9f, any person who violates an administrative order issued pursuant to N.J.S.A. 13:1E-9c, or a court order issued pursuant to N.J.S.A. 13:1E-9d, or who fails to pay a civil administrative penalty in full after it is due shall be subject upon order of a court to a civil penalty not to exceed \$100,000 per day of such violation and each day's continuance of the violation shall constitute a separate violation.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Delaney, Assistant rdous Waste Enforcement

KJD/mte